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Attorneys for Plaintiff,  
ALEX VILLANUEVA

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA,

Plaintiff,

vs.

COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
ESTHER LIM, and DOES 1 to 100,  
inclusive,

Defendants.

Case No.: 2:24 cv 04979 SVW (JC)

**The Honorable Stephen V. Wilson**

**PLAINTIFF ALEX VILLANUEVA'S  
APPENDIX OF EXHIBITS IN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT  
OR, IN THE ALTERNATIVE,  
SUMMARY ADJUDICATION, VOLUME  
2 OF 5**

Date: May 19, 2025  
Time: 1:30 p.m.  
Dept.: 10A

Trial Date: June 3, 2025  
Action Filed: June 13, 2024

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No.	Declaration
1	Declaration of Alex Villanueva
2	Declaration of Alex DiBona, Esq.

Exhibit <sup>1</sup>	Evidence
1	Los Angeles County Board of Supervisors Motion “Report Regarding Options for Removing the Sheriff” Dated October 27, 2020
2	Ordinance allowing Office of Inspector General to Issue Subpoenas written by Veronica Pawlowski dated January 21, 2020
3	Email from Vanessa Chow to John Satterfield and Alex Villanueva regarding FBI Briefing on Fulgent dated February 1, 2022
4	Letter from Alex Villanueva to Hilda Solis Entitled Ethical Violations of First District Justice Deputy dated February 9, 2021
5	“Tweets” from Ester Lim attached to February 9, 2021 letter
6	Letter from Alex Villanueva to County Counsel asking for Defense in Fulgent Lawsuit dated January 31, 2022
7	Denial of Counsel to Alex Villaneuva from Los Angeles County Counsel dated February 15, 2022

<sup>1</sup> Volume I includes Exhibit Nos. 1-17;

Volume II includes Exhibit Nos. 18-30;

Volume III includes Exhibit Nos. 31-40;

Volume IV includes Exhibit Nos. 41-48;

Volume V includes Exhibit Nos. 49-66;

Exhibit <sup>1</sup>	Evidence
8	Letter from Alex Villanueva to Hilda Solis Entitled Ethical Violations of First District Justice Deputy dated March 4, 2022
9	Email from Ester Lim to Hilda Solis's Chief of Staff Cindy Chen dated March 8, 2022
10	Ester Lim's Letter to Vicky Bane, Executive Director of the County Equity Oversight Panel for the County of Los Angeles dated March 8, 2022
11	Ester Lim's submitted online complaint regarding Alex Villanueva dated March 08, 2022
12	Texts between Ester Lim and Max Huntsman Re their complaints dated sometime in March 2022.
13	Letter from Alex Villanueva to Board of Supervisors Opposing Ballot Measure J dated July 11, 2022
14	July 12, 2022 Motion of the Los Angeles Board of Supervisors to Place Ballot Measure for the Los Angeles County Board of Supervisors to remove Sheriff by 4/5 vote.
15	January 4, 2023 Letter from Ron Kopperud to Alex Villanueva regarding request for Interview
16	Email Chain between Alex Villanueva and Christine Diaz Herrera dated January 9, 2023 to March 10, 2023
17	Internal Affairs Bureau "Stacked" Case Filed for Ester Lim's Complaint regarding Alex Villanueva completed October 2, 2023
18	Internal Affairs Bureau "Stacked" Case Filed for Max Huntsman's Complaint regarding Alex Villanueva completed October 2, 2023
19	Internal Affairs Bureau Investigator's Log regarding Ester Lim's Ester

<b>Exhibit<sup>1</sup></b>	<b>Evidence</b>
	Lim's Complaint regarding Alex Villanueva completed October 2, 2023
20	Internal Affairs Bureau Investigator's Log regarding Max Huntsman Complaint regarding Alex Villanueva completed October 2, 2023
21	Letter from Sergio Escobedo to County Equity Oversight Panel on Charges Founded dated October 17, 2023
22	Texts between Ester Lim and Max Huntsman Re wanting their complaint of Alex Villanueva to go public in December 2023
23	Desk Plaque for Max Huntsman and Max Hunts Professional Profile.
24	Devanne, Ann, relevant deposition excerpts
25	Diaz Herrera, Christian, relevant deposition excerpts
26	Komoroski, Constance, relevant deposition excerpts
27	Pawlowski, Veronica, relevant deposition excerpts
28	Murakami, Timothy, relevant deposition excerpts
29	Escobedo, Sergia, relevant deposition excerpts
30	Lilienfeld, Mark, relevant deposition excerpts
31	Lim, Ester, relevant deposition excerpts
32	Huntsman, Max, relevant deposition excerpts
33	Cruz, Mercedes, relevant deposition excerpts
34	Lecrevian, Laura, relevant deposition excerpts
35	Coates, Kyla, relevant deposition excerpts
36	Yang, Roberta, relevant deposition excerpts
37	12/18/2018 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors



Exhibit <sup>1</sup>	Evidence
38	1/29/219 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
39	08/13/19 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
40	10-01-19 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
41	10/15/19 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
42	01/28/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
43	03/31/30 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
44	04/28/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
45	06/29/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
46	07/07/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
47	07/21/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
48	07/28/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
49	08/04/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
50	09/01/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors

<b>Exhibit<sup>1</sup></b>	<b>Evidence</b>
51	09/15/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
52	10/13/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
53	10/27/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
54	11/10/20 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
55	01/26/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
56	05/04/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
57	05/18/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
58	05/19/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
59	06/22/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
60	07/27/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
61	08/10/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
62	09/28/21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors

Exhibit <sup>1</sup>	Evidence
63	12-07-21 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
64	02/15/22 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
65	03/01/22 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors
66	07/12/22 Relevant Excerpts of the Transcript of the Los Angeles County Board of Supervisors

Dated: April 28, 2025

SHEGERIAN & ASSOCIATES, INC.

By:



Alex DiBona, Esq.

Attorneys for Plaintiff,  
ALEX VILLANUEVA

# EXHIBIT 18



# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

*"A Tradition of Service Since 1850"*

Incident Date: Between March 5, 2022 & March 22, 2022  
Department Knowledge: March 16, 2022  
Statute Date: March 15, 2023

## INTERNAL AFFAIRS BUREAU INVESTIGATIVE REPORT

# CONFIDENTIAL

**IAB #IV 2558097**

**EXHIBIT**

**18**

exhibitsticker.com

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IV 2558097

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### **PERSONNEL INVESTIGATION FORM**

### **INVESTIGATIVE SUMMARY**

### **INTERVIEW TRANSCRIPTS**

1-Complainant Max Huntsman

### **EXHIBITS**

- A** County Policy of Equity Report/Notification Form, ICMS #2022-112213
- B** Policy of Equality (POE) Report/Notification Form, #22-045.
- C** One (1) CD containing recordings of Subject Villanueva conducting interviews on Facebook live, and KFI Radio show; Tweets; email to the Sheriff Department Employees; and two articles from the Los Angeles Times.

### **MISCELLANEOUS DOCUMENTS**

- Request for IAB Investigation Memorandum from Commander Jason P. Wolak to Captain Ron Kopperud, dated June 27, 2022.
- Subject of Administrative Investigation Notification Form signed by Subject Alex Villanueva, dated June 29, 2022.
- Manual of Policy and Procedures:
  - 3-01/121.10: Policy of Equality - Discrimination
  - 3-01/121.20: Policy of Equality - Harassment (Other than Sexual)
  - 3-01/121.25: Policy of Equality - Third Party Harassment
  - 3-01/121.30: Policy of Equality - Inappropriate Conduct Toward Others

IV 2558097

# AUDIO/VIDEO TRACKING SHEET



## INTERNAL AFFAIRS BUREAU - Audio/Video Tracking Sheet -

**# IV 2558097**

**Investigator's Name:** Lieutenant Ann Devane

**Total number of USB Flash Drives:** 0

**Total number of compact discs:** 2

**Total number of digital audio files:** 1

### DIGITAL AUDIO FILES

Name
1-Complainant Max Huntsman

### DIGITAL MEDIA

<b>Transcripts</b>	One (1) Compact Disc containing: Audio recorded interview and interview transcript
<b>Exhibit C</b>	One (1) CD containing recordings of Subject Villanueva conducting interviews on Facebook live, and KFI Radio show; Tweets; email to the Sheriff Department Employees; and two articles from the Los Angeles Times.

# PERSONNEL INVESTIGATION FORM

COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT  
PERSONNEL INVESTIGATION

PAGE 1 OF 1

DATE 09/20/2023	No. OF SUBJECTS 1	UNIT(S) INVOLVED Executive Division	I.A.B. FILE No. IV 2558097
MANUAL SECTIONS VIOLATED (BY TITLE AND No.) 3-01/121.10, POE-Discrimination; 3-01/121.20, POE-Harassment(Other than Sexual); 3-01/121.25, POE-Third Party Harassment; 3-01/121.30, POE-Inappropriate Conduct Toward Others			
DATE, TIME, DAY OF OCCURRENCE Between March 5, 2022 and March 22, 2022			RELATED URM FILE No. IF APPLICABLE
LOCATION OF OCCURRENCE Unknown			

SOURCE OF COMPLAINT: ☐ COMMUNITY ☐ SUPERVISION W/C REPORT No. ☒ OTHER SOURCES (SPECIFY) POE #: 22-045

SUBJECT No. 1 OF 1	LAST NAME Alex	FIRST NAME Villanueva	M.I.	RANK OR TITLE Sheriff	EMP. No. 246296
UNIT OF ASSIGNMENT Executive Division		DATE ASSIGNED Division OR REGION Executive Division			
STATUS OF SUBJECT <input checked="" type="checkbox"/> CONTINUING ON DUTY <input type="checkbox"/> RELIEVED OF DUTY - REASSIGNED TO: <input type="checkbox"/> OTHER					
SEX Male	RACE Hispanic	HAIR Brown	EYES Brown	HEIGHT 510	WEIGHT 195
DATE OF HIRE 12/03/2018		DATE APPOINTED TO RANK 12/03/2018		D.O.B. 02/25/1963	
INTERVIEW TAPE RECORDED ON TAPE OF SIDE <input type="checkbox"/> A <input type="checkbox"/> B DATE TIME					

## PREVIOUS FOUNDED INVESTIGATIONS

DATE	I.A.B. FILE No.	MANUAL SECTION(S) VIOLATED	DISCIPLINE
10/21/1992	3132	3-01/090.10: OPERATION OF VEHICLES	Written Reprimand
09/15/1993	6069	3-01/090.10: OPERATION OF VEHICLES	Written Reprimand
11/23/2015	2390479	3-01/030.10: OBEDIENCE TO LAWS, REGULATIONS; 3-01/040.97: SAFEGUARDING PERSONS IN CUSTODY; 3-01/050.10: PERFORMANCE TO STANDARDS	Written Reprimand

SUBJECT No. OF	LAST NAME	FIRST NAME	M.I.	RANK OR TITLE	EMP. No.
UNIT OF ASSIGNMENT		DATE ASSIGNED Division OR REGION			
STATUS OF SUBJECT <input type="checkbox"/> CONTINUING ON DUTY <input type="checkbox"/> RELIEVED OF DUTY - REASSIGNED TO: <input type="checkbox"/> OTHER					
SEX	RACE	HAIR	EYES	HEIGHT	WEIGHT
DATE OF HIRE		DATE APPOINTED TO RANK		D.O.B.	
INTERVIEW TAPE RECORDED ON TAPE OF SIDE <input type="checkbox"/> A <input type="checkbox"/> B DATE TIME					

## PREVIOUS FOUNDED INVESTIGATIONS

DATE	I.A.B. FILE No.	MANUAL SECTION(S) VIOLATED	DISCIPLINE

CODE: C - COMPLAINANT, W - WITNESS

ADDITIONAL COMPLAINANTS, WITNESSES, OR SUBJECTS ON SUPPLEMENTAL PAGES

☒ YES ☐ NO

CODE C	No. 1 OF 1	LAST NAME Huntsman	FIRST NAME Max	M.I.	SEX Male	RACE White	D.O.B. Adult
RESIDENCE ADDRESS Office of Inspector General					RES. PHONE (AREA CODE) ( )		
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT 500 W. Temple Street Los Angeles, CA. 90013					BUS. PHONE (AREA CODE) (213) 974-6100		
INTERVIEW TAPE RECORDED ON TAPE OF SIDE <input type="checkbox"/> A <input type="checkbox"/> B DATE 07/21/2022					TIME UNK		

CODE W	No. 1 OF 1	LAST NAME Pawlowski	FIRST NAME Veronica	M.I.	SEX Female	RACE UNK	D.O.B. Adult
RESIDENCE ADDRESS Justice Deputy for Sheila Kuehl					RES. PHONE (AREA CODE) ( )		
BUSINESS ADDRESS OR UNIT OF ASSIGNMENT Los Angeles, Ca. 90013					BUS. PHONE (AREA CODE) ( )		
INTERVIEW TAPE RECORDED ON TAPE OF SIDE <input type="checkbox"/> A <input type="checkbox"/> B DATE 08/01/2022					TIME		

PRIMARY INVESTIGATOR Sanders Roberts LLP	RANK	EMP. No.	APPROVED <i>R. Korman</i>	DATE 09-2-23
ASSISTING INVESTIGATOR Lieutenant Ann Devane	RANK LT	EMP. No. 478275	DATE SUBMITTED	09/26/2023

SH-AD-669-3/15

IF ADDITIONAL SUBJECTS, WITNESSES, COMPLAINANTS OR DISCIPLINE HISTORIES, LIST ON CONTINUATION PAGES.

CONFIDENTIAL

COLA002041

# INVESTIGATIVE SUMMARY

**CONFIDENTIAL**

**May 19, 2023**

TO: EDUARDO MONTELONGO,  
ASSISTANT LOS ANGELES COUNTY COUNSEL

FROM: SANDERS ROBERTS LLP

**INVESTIGATION REPORT – FORMER SHERIFF ALEX VILLANUEVA / MAX HUNTSMAN**

**1. INTRODUCTION**

County Counsel retained the law firm of Sanders Roberts LLP (“Sanders Roberts”) to conduct an independent investigation into complaints against Sheriff Alex Villanueva related to his use of Inspector General, Max Huntsman’s former first name, “Max-Gustaf,” as well as Sheriff Villanueva’s accusation that Mr. Huntsman is a Holocaust denier. Sanders Roberts conducted that investigation via witness interviews and a review of relevant documents and audio broadcasts. This report details the investigation’s factual findings.

**2. ALLEGATIONS**

The allegations that form the basis of the complaints against Sheriff Alex Villanueva are as follows:

**ALLEGATION 1:** In various public appearances on Facebook Live, KFI Radio, and on Twitter, Sheriff Alex Villanueva subjected Inspector General, Max Huntsman, to harassment on the basis of race/ethnicity/ancestry/national origin.

**3. APPLICABLE POLICIES AND GUIDELINES**

**Los Angeles County Board of Supervisors Board Policy, Chapter 9 – Personnel - 9.015 - County Policy of Equity**

**THE POLICY.** All County of Los Angeles (County) employees are required to conduct themselves in accordance with the entirety of this County Policy of Equity (Policy), and all applicable local, county, state, and federal laws.

**PURPOSE.** This Policy is intended to preserve the dignity and professionalism of the workplace as well as protect the right of employees to be free from discrimination, unlawful harassment, retaliation and inappropriate conduct toward others based on a protected status. Discrimination, unlawful harassment, retaliation and inappropriate conduct toward others based on a protected status, are contrary to the values of the County. The County will not tolerate unlawful discrimination on the basis of sex, race, color, ancestry, religion, national origin, ethnicity, age (40 and over), disability, sexual orientation, marital status, medical condition or any other protected characteristic protected by state or federal employment law, nor will it tolerate unlawful harassment, or retaliation. As a preventive measure, the County also will not tolerate inappropriate conduct toward others based on a protected status even if the conduct does not

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Sheriff Alex Villanueva  
Date: May 19, 2023  
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meet the legal definition of discrimination or unlawful harassment. All County employees are responsible for conducting themselves in accordance with this Policy and its associated Procedures. Violation of the Policy and/or Procedures will lead to prompt and appropriate administrative action including, but not limited to, counseling, training, written warning, written reprimand, suspension, demotion, or discharge.

**COUNTY POLICY OF EQUITY PROHIBITED CONDUCT.** Each County employee is responsible for understanding and abiding by these definitions of prohibited conduct as they may impact any administrative process/proceeding for potential violations of this Policy and/or associated Procedures.

**COUNTY POLICY OF EQUITY UNLAWFUL HARASSMENT (OTHER THAN SEXUAL).** Unlawful harassment of an individual because of the individual's race, color, ancestry, religion, national origin, ethnicity, age, disability, sexual orientation, marital status, medical condition or any other protected characteristic protected by state or federal employment law is also discrimination and prohibited. Unlawful harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment.

**Los Angeles County Board of Supervisors Board Policy, Chapter 9 – Personnel - 9.020 - Employee Accountability<sup>1</sup>**

“Each Department Head shall:

- Hold their employees accountable for actions that include being dishonest, untruthful, and/or which demonstrate a lack of integrity, consistent with Countywide requirements established by the Board of Supervisors, Director of Personnel, Chief Executive Officer, and Auditor Controller, County Code, Civil Service Rules, and departmental policies;
- Hold their employees, including those working in public safety, patient care, judicial affairs, and those holding fiduciary responsibilities, to high standards of honesty and conduct, which are of essential value to public servants;
- Act affirmatively to abate or prevent performance problems and document those problems when they occur;
- Ensure accountability as set forth in the Los Angeles County Charter, Civil Service Rules, and Countywide and departmental policies;
- Take timely and effective corrective action, commensurate with the offense, which may include remedial measures such as counseling or more formal action such as discipline up to and including discharge from County service; and;
- Retain employees in County service on the basis of the adequacy of their performance, correct inadequate performance, and separate from County service employees whose inadequate performance cannot be corrected.

Failure of an employee to perform their assigned duties so as to meet fully explicitly stated or implied standards of performance may constitute adequate grounds for discharge, reduction, or suspension. Where appropriate, such grounds may include, but are not limited to, qualitative as well as quantitative elements of performance, such as failure to exercise sound judgment, failure to report information accurately and completely, failure to deal effectively with the public, and failure to make productive use of human, financial and other assigned resources. Grounds for discharge, reduction, or suspension may also include

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<sup>1</sup> The Los Angeles County BOS Board Policy, Chapter 9 – Personnel - 9.020 - Employee Accountability can be accessed at [https://library.municode.com/ca/la\\_county\\_-\\_bos/codes/board\\_policy?nodeId=CH9PE\\_9.020EMAC](https://library.municode.com/ca/la_county_-_bos/codes/board_policy?nodeId=CH9PE_9.020EMAC).

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any behavior or pattern of behavior which negatively affects an employee's productivity, or which is unbecoming a county employee; or any behavior or condition which impairs an employee's qualifications for their position or for continued county employment.”

#### 4. PROCEDURE

At the beginning of each interview, the interviewer advised each witness of the following: 1. That the witness's role is to tell the truth and reveal all relevant facts to the investigator; 2. That the witness should maintain confidentiality of the investigation; 3. That the witness must report any retaliation to the investigator; and 4. That the witness must not retaliate against any participant. The investigator then asked each witness whether s/he had any procedural questions.

To determine the merits of the allegations against former Sheriff Villanueva, the investigator interviewed the following persons:

NAME	DATES OF INTERVIEW	POSITION
Max Huntsman	07/21/22	Inspector General
Sheriff Alex Villanueva	N/A <sup>2</sup>	Los Angeles County Sheriff

#### 5. INVESTIGATIVE INTERVIEW SUMMARIES

##### Max Huntsman

On July 21, 2022, investigator Christine Diaz Herrera, Esq. interviewed Inspector General Max Huntsman via Teams videoconference. Mr. Huntsman did not have a representative present. Initially, Mr. Huntsman made clear that he is not a Sheriff's Department employee and would not feel constrained to keep the contents of his conversation with Ms. Diaz Herrera confidential, should he feel that his work required divulging them.

##### Background

Mr. Huntsman has been employed by the County of Los Angeles since 1991. He has been Inspector General ("IG") since "late 2013 or early 2014," depending on how the official start date is calculated. He currently reports to Executive Officer, Celia Zavala "for administrative purposes," but he is special counsel to the Board of Supervisors ("BOS"), so he reports to the BOS "for substantive matters." His duties as IG are set forth by statute and ordinance. His office monitors the Sheriff's Department to ensure there is no corruption and to ensure compliance with reporting requirements and public accountability. Over time, Mr. Huntsman's office has expanded to oversee the probation department and some Department of Public Health skilled nursing facilities. However, primarily, his

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<sup>2</sup> The investigators sought repeatedly to schedule an interview with Sheriff Villanueva. Sheriff Villanueva repeatedly ignored such scheduling requests, but ultimately agreed to sit for an interview on the condition that he be provided the investigator's questions ahead of time. The investigator declined that request and accordingly completed this investigation without an interview of Sheriff Villanueva.

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oversight focuses on the Sheriff's Department and jails within the County. The work involves monitoring, inspection, and investigation.

Mr. Huntsman described the IG's role as being primarily to monitor the Sheriff's Department's investigations to provide a "second opinion and quality control," rather than being the primary or initial investigator of incidents. The IG's investigative tools include power to subpoena and statutory directives to the Sheriff's Department to provide information upon request by the IG or otherwise cooperate with the investigations. Mr. Huntsman said that the Sheriff's Department routinely obstructs his investigations. It does so by refusing to comply with subpoenas and refusing to provide information that the IG requests.

#### Conflicts With Sheriff Villanueva

Mr. Huntsman's office includes "about thirty people." They interact with the Sheriff's Department on a variety of matters on a daily basis. Some of those interactions are "smooth and routine," while "others aren't." For example, most of the day-to-day interactions involving access to jails for routine investigative and oversight purposes are routine and polite. However, when it comes to obtaining "actual evidence," the Sheriff's Department routinely blocks the IG's office's efforts. Mr. Huntsman has no direct interaction with Sheriff Villanueva or Undersheriff Tim Murakami.

Mr. Huntsman reported that he has not communicated directly with Sheriff Villanueva since 2019. He said that in 2019, the County had sued Sheriff Villanueva related to the Sheriff's efforts to rehire several formerly-terminated deputies, including Caren Mandoyan. Mr. Huntsman said that his office tried to investigate those efforts as well as the related "truth and reconciliation committee" Sheriff Villanueva sought to establish. The IG's Office investigated and wrote a report about those issues and provided a draft to the Sheriff's Department. In response the Sheriff's Department turned off the IG's access to the Sheriff's Department's computer systems. Mr. Huntsman said that several people in the County asked him to meet with Sheriff Villanueva to try to convince him to restore the IG's Office's computer access.

During the June 17, 2019 meeting with Sheriff Villanueva, the Sheriff said that Mr. Huntsman was "a political hack" and said the IG's draft report was wrong and ridiculous and that the Sheriff's intention to rehire Caren Mandoyan was legal. Mr. Huntsman described Sheriff Villanueva as having told him that if he issued the report, it would impact the then-ongoing civil litigation related to Caren Mandoyan. He said that Sheriff Villanueva told him, in a "significant way" that if he issued the report, there "would be consequences." Mr. Huntsman credibly described this as a threat from Sheriff Villanueva.

Shortly thereafter, Sheriff Villanueva announced on a podcast that Mr. Huntsman was under criminal investigation. This was contrary to best practices, pursuant to which one would typically keep a criminal investigation secret from the subject of that investigation. Mr. Huntsman said that Sheriff Villanueva's announcement was more consistent with an effort to intimidate him, which he believes amounts to a violation of Penal Code s. 518, Extortion of a Public Official. Mr. Huntsman said that since then, Sheriff Villanueva has attempted to intimidate others from conducting oversight in other matters and contexts. Mr. Huntsman said that the Sheriff "kept [the purported investigation] over [Mr. Huntsman's] head for years" until the Sheriff's Department eventually said that it had turned its investigative files over to the Attorney General's Office and the Sheriff's former Chief of Staff, Larry Del Mese, testified that the investigation had not actually uncovered any criminal wrongdoing.



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Subsequently, Mr. Huntsman and the Sheriff's Department have "clashed" in various settings, including before the BOS and the Civilian Oversight Board. One example Mr. Huntsman provided was when the Sheriff told the Civilian Oversight Board that Mr. Huntsman was wrong when he reported that the Sheriff's Department was failing to provide evidence in response to the IG's requests. Mr. Huntsman said he responded by providing evidence supporting his allegation that the Sheriff's Department was withholding documents.

#### Sheriff Villanueva's Alleged Harassment

Mr. Huntsman said that Sheriff Villanueva repeatedly refers to people in ways that are intended to "dog whistle" to his base of extremist supporters to "let them know who their current target is." Mr. Huntsman said that he believes that Sheriff Villanueva refers to him as "Max-Gustaf" (or "Max-Gustav") in order to signal to his extremist base that Mr. Huntsman is "a foreigner...German or Jewish or both." However, Mr. Huntsman noted that after Sheriff Villanueva accused him of being a Holocaust denier (see below), it became clear that he was not intending to signal that Mr. Huntsman was Jewish. Mr. Huntsman said he believed that his German background made him "an easy target." He said that Sheriff Villanueva "likes to target a lot of people" and uses a small group of people he referred to as Sheriff Villanueva's "dirty tricks squad" to gather information about them that he can use to discredit them and have his extremist base target them. He said the Sheriff "collects dirt on his political opponents and then tries to figure out a way to hurt them he turns most easily to race-based techniques because it plays with the people he's trying to curry favor with and he uses whatever means are available to him to do that."

Mr. Huntsman described the Sheriff's "dirty tricks squad" as a group of "a half-dozen or so" people, including a deputy named Mark Lillienfeld that Sheriff Villanueva rehired after he had been caught bringing contraband to a County jail inmate. Mr. Huntsman said he believes Sheriff Villanueva hired Lillienfeld because Mr. Lillienfeld was willing to "do whatever [the Sheriff] asks him to do." Mr. Huntsman said the "dirty tricks squad" also includes a "computer guy" who some people believe places listening devices in offices and "sweeps emails." Mr. Huntsman said he does not necessarily believe that the Sheriff's "dirty tricks squad" hacks emails or places "bugs" in offices, but some people do believe that.

#### Mr. Huntsman's Name

Mr. Huntsman was born Max-Gustaf Edler. His father had been born in Germany and left after World War II. Mr. Huntsman was born after his father had made his way through Canada to San Francisco. He named Mr. Huntsman "Max-Gustaf" after two uncles. The spelling of "Gustaf" with a "f" is the Swedish spelling of the name and just happens to be how the uncle Mr. Huntsman was named after spelled his name. Mr. Huntsman describes his father as having had "problems with drugs," not working, committing crimes, and eventually leaving the U.S., moving to Switzerland, and starting a new family. Mr. Huntsman believes that his father's problems stemmed from having grown up in Nazi Germany and therefore Mr. Huntsman has "no love for Nazi Germany...in fact, quite the opposite" and does not at all deny that the Holocaust occurred.

When Mr. Huntsman was a child, he wanted to change his last name, but his mother would not let him. Eventually, during law school, he was able to have his last name changed from Edler to Huntsman. He said that during all of that time, he did not go by "Max-Gustaf" but rather by "Max." His official name in some places was listed as "Max-Gustaf" but he ultimately was able to have it officially changed to "Max." He said that the State Bar still has a record of him as "Max-Gustaf" and in an old County computer record, he is listed as "Max Gustaf" but he is officially, professionally, and socially "Max." He

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said that “nobody [who knows him] would ever tell you ‘that guy is Max-Gustaf.’” After Sheriff Villanueva raised the name “Max-Gustaf” Mr. Huntsman took steps to correct the State Bar’s record to “Max” from “Max-Gustaf.” Mr. Huntsman said that there is no fraud or effort to conceal anything by changing his name, but he just does not want to be associated with a culture that he does not feel that he is a part of.

#### Sheriff Villanueva’s References to “Max-Gustaf”

Mr. Huntsman became aware of Sheriff Villanueva referring to him as “Max-Gustaf” from a KFI radio broadcast. He said that the upshot of Sheriff Villanueva’s radio remarks was to purport to wonder why Mr. Huntsman had changed his name and to intimate that “someone should look into that.” He said that he initially thought that Sheriff Villanueva’s reference to his former name was an effort to imply that he was Jewish in order to “dog whistle” to his extremist supporters. However, he said that he has come to believe that the reference was to more generally cast him as an “other” or a “foreigner.” He said that in hindsight he believes that the Sheriff was using the former name in order to set up the allegation that Mr. Huntsman is a Holocaust denier.

#### Holocaust Denier Allegation

Sheriff Villanueva eventually told the Los Angeles Times editorial board that Mr. Huntsman is a Holocaust denier. Mr. Huntsman said he believes that this information came from Adam Loew. Mr. Loew is the husband of a former Metro employee who sends frequent emails to many people in the County alleging widespread corruption that ultimately led to his wife being terminated. Mr. Huntsman is one of the people to whom Mr. Loew sends his frequent emails. Mr. Huntsman believes that Mr. Loew and Sheriff Villanueva became allies because they both dislike and oppose County Supervisor Sheila Kuehl. Mr. Huntsman said that Mr. Loew was the first person he saw referring to him as “Max-Gustaf.” When Sheriff Villanueva started using the name, it “rang a bell” because he recalled Mr. Loew having used it.

Mr. Huntsman said that he has never been a Holocaust denier and has no idea what could have given anyone the idea that he was.

When Sheriff Villanueva accused Mr. Huntsman of being a Holocaust denier, there were news stories about it. Mr. Huntsman received communications and messages from friends and acquaintances, in particular from Jewish friends and acquaintances, expressing sympathy for his having to endure such an allegation. He said that he otherwise did not receive any negative feedback or harassment as a result of Sheriff Villanueva’s allegation. Mr. Huntsman sent an email to the BOS in response to Sheriff Villanueva’s allegation that he was a Holocaust denier. He also filed a CPOE complaint based on his belief that the Policy of Equity required him to do so.

#### Veronica Pawlowski

On August 1, 2022, attorney Christine Diaz-Herrera interviewed Justice Deputy, Veronica Pawlowski via Teams video conference. Ms. Pawlowski did not have a representative present.

#### Background

Veronica Pawlowski has worked for the County of Los Angeles since 2012. She served as Supervisor Sheila Kuehl’s Justice Deputy for two and a half years. Previously she held the position of Special Counsel to the Board of Supervisors on Child Welfare issues. Subsequent to that, she held a

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position at County Counsel where she advised the Department of Children and Family Services; the Probation Department; and the Los Angeles Homeless Services Authority. Pawlowski has been an attorney for 19 years. She received her B.A. in Political Science and Communications from USC in 1997 and her law degree from Boston College in 2000.

While she worked at County Counsel, Ms. Pawlowski worked on ordinances that give bodies of oversight their authority. She was really aware about how that relationship is supposed to work. The Supervisor saw Ms. Pawlowski as a subject matter expert on ordinances because she knew them better than anyone else.

#### Interaction with Sheriff's Department

Most of Ms. Pawlowski's interactions with the Los Angeles County Sheriff's Department ("Sheriff's Department") is at the Assistant Sheriff level. Her work with the Sheriff's Department has been very focused on the jails. Supervisor Sheila Kuehl ("Supervisor Kuehl") called for closure of a main jail in Los Angeles County. Much of Ms. Pawlowski's work has been focused on this issue. Ms. Pawlowski has dedicated a lot of time to learning how the jail operates. The Sheriff's Department has a board liaison and a board liaison team. This team advises Supervisor Kuehl's office of critical incidents.

#### Sheriff's Alex Villanueva's Facebook Live Sessions

Part of Ms. Pawlowski's responsibilities on behalf of her bosses is to sit in on meetings and keep them informed about what is going on in her portfolio. Ms. Pawlowski started to listen to Sheriff Villanueva's Facebook live sessions to alert her bosses if he said anything newsworthy. Ms. Pawlowski could not recall how many Sheriff Villanueva Facebook live sessions she has listened to. She has listened to them both live and via a recorded session. Ms. Pawlowski has listened to "just about every session" since Sheriff Villanueva started doing them.

In the beginning it was just Ms. Pawlowski listening and taking notes. Somewhere along way, she started to receive summaries of the sessions from the CEO's office, Countywide Communications Unit. Ms. Pawlowski did not know who sent them because she would receive them from Supervisor Kuehl's Communications Deputy. Lenny McGuire is in charge.

#### Max Huntsman

Ms. Pawlowski reported that Sheriff Villanueva made comments about IG Max Huntsman, "nonstop." Sheriff Villanueva called him "Gustav Hunstman," alluding that he is "some kind of Nazi." She said that Sheriff Villanueva has made his comments in writing. Ms. Pawlowski believes Sheriff Villanueva referenced it in a letter and does not hide it. Sheriff Villanueva referred to Mr. Huntsman and said his real name was "Gustav." Ms. Pawlowski believed Sheriff Villanueva's comments were intended to be about Mr. Huntsman's national origin.

#### KFI Radio Talk Show

Ms. Pawlowski reported that Sheriff Villanueva also made comments about the Justice Deputies on the radio station, KFI. Ms. Pawlowski said everything blended together. She listened to his comments in the different forums giving him space. She could not distinguish one from the other. They listened to all of his comments across various media platforms. Ms. Pawlowski believed some of it was captured and could be located by Lenny McGuire.

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## **6. DOCUMENTARY EVIDENCE**

- a. October 21, 2021 Tweet from @LACoSheriff\_33;**
- b. March 22, 2022 Tweet from @LACoSheriff\_33;**
- c. March 16, 2022 Facebook Live recording;**
- d. March 29, 2022 Facebook Live recording;**
- e. April 26, 2022 Facebook Live recording;**
- f. July 13, 2022 Facebook Live recording;**
- g. October 26, 2022 Facebook Live recording;**
- h. March 5, 2022 Email From Sheriff Villanueva titled “Message From the Sheriff: Transparency and Accountability”;**
- i. March 6, 2022 KFI Radio Show recording;**
- j. April 1, 2022 Los Angeles Times Editorial titled “Editorial: The Villanueva Saga Just Gets Odder and More Destructive”;**
- k. April 1, 2022 Los Angeles Times article by Alene Tchekmedyian titled: “Sheriff Villanueva Makes Ugly, Unfounded Claim Against County Watchdog.”**

# **INTERVIEW TRANSCRIPTS AND AUDIOS**



**IV 2558097  
AUDIOS AND  
TRANSCRIPTS**

# COMPLAINANT INTERVIEW



**REFER TO INTERVIEW TRANSCRIPTS AND AUDIO CD**

**1. COMPLAINANT MAX HUNTSMAN**



**IV 2558097**

**WITNESS INTERVIEW**

**INSPECTOR GENERAL MAX HUNTSMAN**

**Herrera:** I am an attorney with Sanders Roberts. We have been hired by the county to conduct this independent investigation. The county, because they don't- apparently the Sheriff's Department doesn't know how to use these Teams videos, I'm also going to record via audio on another device. Just letting you know that. 'Cause apparently they haven't figured out- they haven't figured out how to incorporate speech.

**Huntsman:** Why would you be interested in what the Sheriff's Department can do? They have CPOE investigators who have interviewed me and I thought this was an external investigation because the county was not pleased with how the Sheriff's Department was handling it. Is that not correct?

**Herrera:** I think the idea, and I'm sure you're familiar with how the CPOE process is, but typically there's an intake and an assessment done and then depending on, you know, the results of the intake and assessment, you know, it's farmed out to different people to do investigations. In this case, because of the nature of the allegations, I think also the subject of the investigation itself, I think the Sheriff's Department decided that it made more sense, and the county, to have an external, a neutral third party, to conduct this.

**Huntsman:** I hear what you're saying and that's true as to all CPOE investigations except the Sheriff's Department ones. And I was actually contacted by a Sheriff's Department investigator. I wasn't told that it was an Intake decision and then the sheriff, in the link I sent you, he told the Times Editorial Board that I had made a CPOE complaint against him. So I'm pretty sure that they had triggered some process internally that he was informed of. And so I'm just- Look, it doesn't matter. I'm very skeptical about this whole process.

**Herrera:** I'll certainly ask you some questions about that to get a better sense of who you spoke to and I can look into that. So again, for the record, my name is Christine Diaz Herrera. Can you say your name for the record?

**Huntsman:** Max Huntsman.

**Herrera:** Perfect. And today is July 21<sup>st</sup> 2022. It's 2:05 PM. I have an admonition that I'd like to read. So my admonition states that "You are about to be questioned as a part of an official Los Angeles County Sheriff's Department administrative investigation. You are here as a witness in a matter which concerns another employee, the complainant. You obviously, as you know, are not a subject of the investigation itself and you are not under investigation at this time. I think the question that they typically ask is whether you're aware of the Policy and Ethics chapter of the Manual of Policy and Procedures, and this might be different because you're not actually within the Sheriff's Department.

**Huntsman:** Right. The admonition doesn't quite make any sense, but I note the admonition.

**Herrera:** Right, and, you know, essentially the other piece of it is just that this is a confidential interview and we ask that you keep the contents of- the substance of what we talk about today confidential but certainly that you've talked to me or that this investigation exists is not a secret and, you know, to the extent that you share it with someone else, that's certainly your purview.

**Huntsman:** I'm not part of the Sheriff's Department.

**Herrera:** Correct, I am aware of that.

**Huntsman:** So if you're conducting an internal sheriff's investigation, already I was contacted by the Sheriff's Department. I was told it was confidential and then the sheriff told the LA Times about it. So I don't personally hold any stake in the confidentiality of the sheriff's process. I'm not questioning you or what you're assigned to do, but as soon as you provide this to the sheriff, he will do whatever he thinks is best politically with it and that's how it is. So I'm not going to agree that I won't talk about this with whomever I feel like and including County Counsel, including Esther Lim, including all the other folks who I think it might be appropriate in order to protect the rights of the individuals who he's been targeting.

**Herrera:** Sure, and I will say that my work is at the direction of County Counsel and because he is the subject, it wouldn't be him that I'm reporting to and it wouldn't be him that I would be actually giving the final report to, but in any event, I do understand.

**Huntsman:** Okay that's fine. The reason my tone has changed is because you read me a Sheriff's Department internal investigation admonition. If you're telling me that you work for County Counsel and this is going to County

Counsel, then I apologize for my tone. It's the Sheriff's Department and their conduct that I take issue with. So if County Counsel just said, 'Hey look, because this is going to go to the sheriff, read this admonition', I understand that and I have no beef with County Counsel. My concern is with the conduct within the Sheriff's Department. Once County Counsel's done with their investigation, if they then make a determination of what they have to tell the sheriff, I don't have any problem with that. I thought this was being conducted by the sheriff, in which case I have a different opinion.

**Herrera:** And that's a fair point, and again, in terms of process, all I can tell you is that, you know, they gave me all of the things that they normally would use because I'm standing in their shoes, so to speak. In some ways that this would normally be done, typically by somebody within the Sheriff's Department.

**Huntsman:** My statement to the Sheriff's Department wasn't given to you?

**Herrera:** [inaudible] it's not.

**Huntsman:** Okay. Because County Counsel has asked you to do this. The Sheriff's Department didn't, okay got it. So you don't- When you get to the questions I'll talk to you about that.

**Herrera:** Okay, fair enough. That's what I'm saying. So, you know, I apologize. It sounds like there's some pieces of information out there that I may not have yet--

**Huntsman:** No no, it's okay.

**Herrera:** --but certainly I will make every effort to make sure that I do get that information. I typically just start with a little bit of background information. So, you know, how long have you worked with the County of Los Angeles?

**Huntsman:** Since 1991.

**Herrera:** And what is your current position?

**Huntsman:** Inspector General.

**Herrera:** And how long have you been in that position?

**Huntsman:** Well I was hired in 2013, and the post was sort of officially anointed in 2014. So, depends on how you look at it, but it was late 2013 or early 2014.

**Herrera:** Correct. And, who do you report to?

**Huntsman:** Technically I report to the Executive Officer, Celia Zavala. I have an odd status in that I'm Special Counsel to the Board of Supervisors, so she supervises me primarily for administrative purposes and I report to them for substantive matters.

**Herrera:** And when you say you report to them, you mean you report to the Board of Supervisors?

**Huntsman:** My reports go to the Board of Supervisors. I'm, in addition to County Counsel, I'm the other lawyer for them in the county and so I give them legal opinions from time to time. I interact with them. So I have a kind of a weird status, but technically I'm part of the Executive Office and my boss is Celia Zavala.

**Herrera:** And what are your duties typically? I know that's a broad question, but--

**Huntsman:** It's a broad question. There's an ordinance that sets forth many of my duties and there are California statutes that set forth my duties. I'm a county officer and so my duties are set forth by statute and ordinance. The short version of them is that, my office was created to monitor, at first the Sheriff's Department, to make sure that we didn't have corruption within the Sheriff's Department of various sorts and to make sure that there were public reports, transparency, accountability for sheriffs' conduct to protect constitutional rights of prisoners and the public in general and so that's how we were created. Over the years we've had our responsibility expanded a bit, to include the Probation Department; we are actively responsible for- at one point we did some work on skilled nursing facilities that involve the Department of Public Health. So our mandate is a little broader under 25.303 of the Government Code. We can advise the sheriff- the supervisors on matters other than the sheriff because they have a duty to supervise all county officers, and we do that from time to time, but it's primarily Sheriff's and Probation, including the jails. We also have responsibility for all the different county and noncounty folks that have any kind of impact on the jails and our work is partly evaluative in terms of reports on procedures and practices, partly investigative. In our earliest days we were less investigative. Our duties were expanded, first by ordinance and then ultimately to some degree by statute.

**Herrera:** Do you have any oversight with regards to, like, use-of-force issues that come up within the Sheriff's Department?

**Huntsman:** Oh yeah, absolutely. Our staff role out to all officer-involved shootings and we are supposed to be able to monitor and actively investigate those instances by law, but the Sheriff's Department does not permit us to properly do it. What they do permit is for us to come on scene for a shooting, get a walk-through -sometimes a partial walk-through- of the scene and some basic information about what's happened. They usually don't cooperate with our investigations after that. So for instance there was a guy who was arrested in a- Allegedly there had been a kidnapping and so they had done sort of an aggressive attempt to arrest him with other people in the car, that had endangered their lives. We asked for the reports relating to the kidnapping. It was the justification for what they did; they refused to give it to us. So there's a disconnect between what our job is under statute and ordinance and what the Sheriff's Department obstructs or does not obstruct. But we do go out to the scenes.

We do a similar thing for in-custody deaths, on a case-by-case basis. So in some instances where there's in-custody deaths or even uses of force, Category 3 -the more serious uses of force- then we sometimes go to the scene again to see the scene, to look at it, but sometimes we don't. Because there are instances where that's not really helpful based on the way things operate in Custody, when we gather any information, so. So we do do that too. And yeah, as to use of force in general, part of our duties are to review.. not on a case-by-case basis but overall, the use of force and the way they're handling policies. We are permitted to do individual investigations but we're not required to.

**Herrera:** What about if someone was injured while in custody? Is that type of allegation, is that something you would look into?

**Huntsman:** Yeah. Again, the way our mandate is worded, we are responsible for monitoring and sometimes investigation matters in Custody, which includes what you describe, as well as many other issues. Any kind of things having to do with the terms of confinement and the manner in which people are held, any complaints they have. So we get complaints directly from people, we go and talk to them, we conduct inspections of the jails as well as limited investigation as to individual incidents. The Sheriff's Department has primary responsibility and our primary model is that we prefer to monitor the Sheriff's Department's investigations. But we are lawfully entitled to conduct a follow-up investigation. So for instance, we have recently in our investigation in assisting the Attorney General's Office have done some onsite interviews and reviews and

taken photographs and whatnot. So I recently was down at the East LA Station and took a photograph of a 3%er logo that has been discussed recently and has been a matter of- I think will be a matter of public concern but has been a matter of concern within the county. So that's kind of how we function. We don't investigate every case. We're not ever the first level of investigation. We're meant to be sort of a second opinion and quality control.

**Herrera:** Have you had any role in- Let me back up. Are you aware of there being an incident where there was someone who was injured while in custody, allegedly by an officer putting his knee on their neck where they couldn't breathe?

**Huntsman:** Oh yes.

**Herrera:** Okay.

**Huntsman:** I'm very much aware of incidents like that. I don't know about the 'couldn't breathe' part.

**Herrera:** That they put the knee on the neck. And that they--

**Huntsman:** Yeah. I think the one that has gotten a lot of attention of late is the Escalante incident. Escalante was the person who got the thing done to them and Deputy Johnson was involved in it, and I'm very much aware of that incident.

**Herrera:** And is that an incident that you are investigating separately or looking into or, or you just monitor it?

**Huntsman:** We are attempting to investigate it; however, the Sheriff's Department has been obstructing our investigation.

**Herrera:** And how do they do that? How do they obstruct?

**Huntsman:** Well the tools that we have for investigating are two parts: one is an ordinance, and statutes, that require the cooperation of the Sheriff's Department. The other part is subpoena power, which is also according to both ordinance and statute. And so when it comes to the subpoenas that we issue, the Sheriff's Department does not comply with them, and that's how they obstruct. When it comes to the other part of our ordinance, which is supposed to be self-executing, which is that we have the authority to require any county department and any Sheriff's Department employee to provide information to us upon request in the manner that we directed, they simply refuse. And that's done at the



direction of the sheriff and then, of course, as- we're talking here because of more active efforts the sheriff has taken to obstruct my investigations that began when he first took office and we started to report on his rehiring of a deputy, a law enforcement gang member, Caren Mandoyan, and when we reported on that then he started to take some actions against me: placed me under criminal investigation and the subject of my information I provided to CPOE related to another effort on his part to attack and discredit me, which I believe was for the purpose of obstructing our investigations into his misconduct and law enforcement gangs. But when I was talking about them obstructing our direct investigations, I was referring more to the fact that they refuse to comply with subpoenas and refuse to comply with information requests except on limited bases.

**Herrera:** Now is that something that you can compel them to do so in court or is that something--

**Huntsman:** Yes. The subpoenas have a built-in mechanism and we have- So the sheriff was initially subpoenaed to speak about law enforcement gangs. He refused to talk. The county took the action permitted for in the statutes, certified the matter with contempt proceedings to the court. The court told the sheriff that he could not ignore our subpoenas and then he showed up. He then refused to take the oath and so we had to go back to court and get him compelled to take the oath. So then he took the oath and swore to tell the truth and we asked him a bunch of questions and he refused to answer many of them. So we have to go back to court to compel him again and we're in the process of preparing that. So there is absolutely a mechanism for compelling the subpoena process, which is a very slow mechanism and the sheriff has I think intentionally made it slow, so it hasn't effectively compelled the behavior even though we've won every time we've gone to court, and the court has followed up with us.

The other mechanism I mentioned, that's the subpoena process. Our inherent authority to direct county employees, as an officer of the county given that authority, the Sheriff's Department also does not comply with that. County Counsel - I think it was last week - filed a petition for a writ of mandate in the Superior Court to compel them to comply with that legal duty and.. which should do a bunch of things. Like, when I first came under criminal investigation, they shut off our access to computers. So if we had that access we wouldn't even have to ask them; we would just type in our code word and we would pull up information on the computers. So that's part of that writ of mandate, to say you need to turn that back on. Body cameras for instance. The whole plan with putting out body cameras was that we would have

direct access to that video, without having to ask the Sheriff's Department for it and the Sheriff's Department has refused to comply to that. So then that's part of that writ of mandate that will eventually, I suppose, be litigated in court, but it takes a very long time. We have no, you know, direct ability to enforce or to compel since the Sheriff's Department's a stand-alone entity.

You look like you're frozen. Are you there? I think we have technical difficulties, so I don't know what of this you can hear, if any. I'm going to stop talking. [silence 0:18:09 to 0:18:49] Hello, you're moving again.

**Herrera:** Yeah, I could hear you but you couldn't hear me. So I--

**Huntsman:** Yeah, your picture froze in a one position and then I couldn't hear anything from you. So I kept talking for a while--

**Herrera:** It was the whole thing, I got all of- The last thing I heard was that, you know, that the process to access things like body-worn cameras, that there's no direct ability to enforce or compel, so you've been going through that process to get that type of information.

**Huntsman:** Right, apart from the legal process, we don't have any ability to directly do something. The county, everything it does with respect to the Sheriff's Department is controlled by the sheriff. So for instance, Murakami the undersheriff was found by CPOE in the past to have violated CPOE rules and that was submitted to the sheriff and the sheriff said 'I'm not taking any action.' Mandoyan, the county had some ability yet they had to sue him to prevent him from rehiring Mandoyan. So it's not like I can say, 'Hey you're a county employee. If you don't answer my questions you're fired' because the sheriff gets to decide who to fire. So effectively I can do nothing without the sheriff's permission and the sheriff does not choose to give it. It's kind of, like, Watergate where they fired the special prosecutor. Unless the person being investigated agrees to it, they can't be investigated. Unfortunately that's the way it currently is.

**Herrera:** Just an aside, but the Board can't target the money? Like for example, the contractors that, like, the body-worn cameras, like 'I'm not gonna pay unless we have access to it.'

**Huntsman:** That's correct and recently something like that has just happened, which is, has to do with school resource officers. So in that context, the Board directed us to approve or disapprove the contracts in those matters rather than- They would basically delegate it to us, their approval authority. All county contracts are controlled by the Board, but



the downside is that these are important contracts and the budget point- they could turn off the sheriff's budget, say 'We're gonna defund the police,' as people have sometimes requested, but they don't want to do that because we need police, you know. So unfortunately the mechanisms they have to control the sheriff are all blunt instruments that would have a negative impact upon the public and less of an impact on the sheriff. And so, it's kind of like sanctions in the international arena where if you put sanctions on a county then the people of the country suffer and the leaders sometimes don't, you know. It's that same kind of problem. In theory they ought to have a lot of power and authority, but they- in practice they don't really have a mechanism to force the sheriff. Which is why - I don't know if you followed it, but recently they voted to put on the ballot for the public to consider whether or not they could remove the sheriff by a four-fifths vote for failing to abide by his legal duties as well as obstruction of investigation. So that's kind of a mechanism that, if the voters approve, they would then have the ability to say to the sheriff, 'Look, you're not following the law and so we're going to remove you if you don't follow the law.' Still, politically that's a big pill to swallow.

**Herrera:** Right.

**Huntsman:** So I don't know if they would actually do it because, again, the impact on the public and the perceived impact on the public is very great and so I think they would be loathe to use that mechanism for enforcement purposes. What we really need is, is court-ordered compliance and that will take time. We also have an investigation by the attorney general that could result in court-ordered compliance, which will also take time. So there are mechanisms, but they're all slow.

**Herrera:** That seems to be a theme everywhere, not just here. With regards to your interactions with the sheriff's office, what's the extent to your typical interactions with them? Like, do you.. I know it's a broad question.

**Huntsman:** Well it is a broad question so I'll break it down into different sort of categories. There's me personally; there's my office; and then there's what you mean by the sheriff. So me personally, honestly that's a laugh. My office, which is roughly 30 people, a little less, have a variety of duties and so we have a variety of interactions with the Sheriff's Department. And some of them are smooth and routine and some of them aren't. So on a daily basis I have monitors who go into the jails and inspect the jails, talk to people, do a variety of things. I have inspectors who gather information regarding reports that we're working on; have communications with people at the middle or bottom of the

Sheriff's Department; I have lawyers who write reports and do analysis who talk to, again, people at the middle or bottom of the Department. And those communications are relatively smooth. Under the current administration, there have been restrictions placed on them so that when we make requests for documents or other things, those have to go up the chain and get approved and they don't get approved, except in cases where they think it's not important. But in all the important cases, such as the incident you're referring to where the man got the knee on his head/neck area, then we don't get anything. So.

But on the day-to-day interactions, there's a fairly polite interaction and that goes for me as well. When I went down to escort the Attorney General's office to do these site visits, we were treated fine. An assistant sheriff was there. He's one who we have a long history of communication with because we're a monitor in the jails under a federal law, see Johnson, having to do with the ADA, and one of my assistants, who has just left to go work in Philadelphia, had a very longstanding good relationship with him. So that was all very smooth. I was able to go in and take the picture that I took of the 3%er logo without any trouble. It's not always quite that smooth, but when it comes to requests for actual evidence in our investigations, that's where we're shut down. So as long as we're polite and we don't cause any trouble, they're polite to us.

And that's my staff, that's me, as to the department in general. As to the sheriff, zero. He sometimes sends letters- his undersheriff sometimes sends letters. They are rarely- they're usually nonsensical, rarely in response directly to what we say. So for instance, in January we requested evidence regarding law enforcement gangs under the new statute, Penal Code 13670, and he didn't respond; Murakami sent us a letter. And he sent a letter to the Board telling me to cease and desist from the use of the term and all these other things. And that's the kind of response we get, or tweets talking about us. The thing that caused me to report to CPOE on this matter was a tweet by him, or a press release by him, attacking me, not communication to me. I haven't talked to the sheriff personally since.. he threatened me back in 2019 and I haven't talked to Murakami. We used to have a little interaction with some of the higher level folks at the Civilian Oversight Commission, but they stopped going, and they're required by ordinance to go to that and they don't do that anymore.

So we don't have any real relationship with the management of the Sheriff's Department at that level. At the assistant sheriff level, [unintelligible ] 2630 Patrol and Custody, we have cordial relations. You

know, I can call them or email them and they email me and we communicate just fine.

**Herrera:** You said in 2019 he threatened you?

**Huntsman:** Yeah, that was in June, June 17<sup>th</sup> of 2019. I'd mentioned that we wrote a report about Caren Mandoyan, the grim reaper, who he was trying to rehire. The county had sued him because he was doing that unlawfully, and we set about trying to investigate the manner in which the sheriff was saying he was going to rehire a bunch of fired deputies including Caren Mandoyan -what he called a Truth and Reconciliation Committee or Commission- that he was going to set up within his office. So we tried to investigate that and he refused. We wrote a report about it as best we could with the information we could gather, and I gave him a draft of it, and when I did that he shut off our computer access and I was asked by people in the county to try to convince him to change his mind.

So I met with him personally and said, 'Will you please turn back on our computer access?' and he used the opportunity to tell me that I was a political hack, that my report was ridiculous. I have since learned he never read it. But he said that it was all wrong and that his hiring of Mandoyan was correct and wonderful, and that I shouldn't issue the report, because it might influence the civil litigation regarding rehiring Mandoyan. And I said, 'Look, that's my job as the Inspector General to issue this report and what happens in the civil case isn't my business. I would think it wouldn't have any impact because I think probably it's unlawful, but that's for you to work out. I'm just reporting to the public what happened.' And in that context, he said to me, 'If you issue this report, there'll be consequences,' and he said it in a significant way, but he didn't say what they were and his number two, Mr. Del Mese, who was present, quickly changed the subject. And a short time later, he announced to the press that I was under criminal investigation and sent a letter to the Board asking them to relieve me of duty because of the 'horrible conflict' there was for somebody who is being criminally investigated to be responsible for--

**Herrera:** I'm sorry, you were just a little bit fast. I'm only so good at typing. I was not hired for my typing skills. So you said he announced- what did you say he announced?

**Huntsman:** In a podcast, he told some representative of the media that I was under criminal investigation for stealing from the county, basically, from his department, stealing data, and he had Murakami send a letter to the board asking- saying the same thing and asking that I be removed from office. So he announced it publicly. The reason I point that out is

because that's not how you begin a criminal investigation. If you're in law enforcement and you think somebody committed a crime, you prefer to conduct an investigation without the target knowing that you're investigating them. The last thing you do is announce publicly, to start, that you're conducting an investigation. But that's exactly what you do when you want to intimidate somebody. And so that's why I believe what he did then was a violation of 518 of the Penal Code: Extortion of a public official through a threat in order to try to get them to not discharge their duty, in this case; he didn't want me to issue that report. And then when I did, he wanted to inflict the consequence. Since then, he has taken a number of actions against people involved in oversight, all of which designed, I believe, to intimidate them in order to suppress investigation of the law enforcement gangs and of his misconduct-alleged misconduct of various kinds, including the Escalante matter, the Kobe Bryant matter, and other instances which we tried to investigate but didn't. So I think it was the beginning of a process that he then developed as a way to prevent, the officials of the county from conducting oversight over him as they're required to do by law. And I go into that detail because I don't think it's a coincidence the thing that I reported here I think was a part of that process.

**Herrera:** Right and I think it's good for context so I appreciate the background information. With regards to that issue, was there any kind of outcome or.. was there any kind of admonition from the Board about his behavior or was there any type of followup?

**Huntsman:** A bunch of things have happened. The Board did respond and say 'No we're not going to remove Huntsman. We agree with you; there's a conflict, but the conflict is for you to investigate Huntsman, especially based on what you are claiming to investigate him on.' What he claimed was my crime was that when he was about to be sheriff, we discovered that the Sheriff's Department had a set of internal documents related to discipline that it kept secret from us, which was in violation of law, and we brought this to their attention and said, 'You need to provide us these hidden files.' We used to have computer access to their discipline records and suddenly we learned that all the runs we'd been making had been inaccurate because some of them, some records just weren't visible. It was as though they never existed. And it was a mechanism used to protect sensitive documents and make them only visible to the people in Internal Affairs. Which wasn't a bad thing; it's just the way- the mechanism they used was bad. So we brought that to their attention. They hemmed and hawed and didn't get around to complying with us, until the sheriff- the current sheriff -won the election. And then pending his election win, he contacted the head of Professional Responsibility - or so has testified Del Mese, his chief of staff, the guy who was there

when he threatened me, has testified that the sheriff directed him to do this - he contacted her and they provided her a settlement agreement for Mandoyan to get his job back. They were trying to get Mandoyan rehired before Sheriff Villanueva took office so that nobody would know that he had done it. And when that happened, the Sheriff's Department changed its mind. Because we had said to them, 'You know, you need to provide us these records, now more than ever that there's a new sheriff coming in. If you were to delete or destroy records, we'd have no way to prove it, but if you give us these records, then we can- we have a copy that we can compare to records in the future.' After that happened - Alicia Ault was the person who got that - she agreed to give it to us. It was approved by the sheriff, I was told. I requested it in writing and we got a copy of discipline records that included the sheriff's discipline records- the current sheriff, Villanueva -and he believes we did that in order to provide them to the Board who could put them into a nifty hit piece, political mailer or do some skullduggery against him. The proof that that didn't happen is the fact that in those discipline records there's proof that things he said about his discipline record are false, and by law the Department can make those public: peace officer bill of rights. The term that's commonly used to refer to Penal Code 832.7, which is actually not part of the peace officer's bill of rights, has restrictions on what can be put out publicly about a law enforcement officer's discipline records, but there's an exception when you yourself give false information.

So he has done that regarding one of his cases and nobody in the press knows about that. And that's because when we got that evidence, we put it on ice, we sealed it, we did not give it to the Board, we didn't give it to anybody. We kept it. We didn't even review it ourselves until much much later after all this happened, but he tried to frame that as a crime and presented it to various folks to try to get them to be interested: the FBI, the AG, and this has all been testified to by Del Mese recently at the Civilian Oversight Commission. So that's--

**Herrera:** What's the last name? I'm sorry.

**Huntsman:** Del Mese?

**Herrera:** Yeah. How do I spell it?

**Huntsman:** Del Mese's last name is spelled D-E-L is one word and then the second word is Mese, M-E-S-E. And he was the sheriff's chief of staff. He was on his transition team and became his chief of staff. He was dismissed from that position maybe a year later, but at the time he was being- when these things were happening, Del Mese was his chief of staff, and

at the time that the sheriff threatened me in June, Del Mese was still his chief of staff. And Del Mese testified on July 1<sup>st</sup> about some of these facts. So the sheriff put together that criminal case, tried to sell it to the FBI, to the Attorney General, to the DA. Nobody bought. He got a letter from the Civilian Oversight Commission, or Murakami, his number two, did, saying, 'You know it's a conflict for you to investigate the inspector general. You shouldn't be doing that,' and Murakami said, 'You know you're right, we agree. We're going to give it to another agency when we reach an appropriate point of handoff' - this is the term he used. They never did. They kept it over my head for years, and the Board had nothing they could do other than say, 'No we're not going to remove Huntsman' until near the end of last year and the Civilian Oversight Commission got some traction with getting County Counsel to ask the attorney general to step in.

Actually I've got two agencies- it's- No that's right, I'm confusing two things the attorney general did. The first one was opening a civil rights investigation against the sheriff, and that happened oh a year and a half ago or so. And then, more like a half a year ago or so is when the County Counsel sent a letter to the AG saying 'Can you please step in and conduct some oversight over the sheriff, a la your question about, you know, what mechanisms are to enforce stuff. And they addressed a number of things including, a group that he has, called the secret police by some people, that targets his political enemies, and that's part of that process I talked about where he's targeted people who oversee him. That warrant investigation against one of the supervisors and an ally of hers in a nonprofit organization, a bunch of things, and the investigation against me. And the attorney general said, 'Well we'll look into that. We'll take a look at what he's got on Huntsman and see what we think about it and we'll look at that warrant process. But we're not going to, like, take over the Sheriff's Department.

When that happened, the sheriff publicly said, 'Well I've already submitted the case on Huntsman to the attorney general. I did it a couple of months ago. So supposedly - I think it was around November of last year - he had submitted it to them for filing and asked them to prosecute me. I haven't seen those documents 'cause it's all part of the criminal investigation, but if it's what I think it is, it's a violation of my constitutional rights because he doesn't have any probable cause. What I did was provided for in my job description and in writing with the approval of the then-sheriff Jim McDonnell, so. So that's kind of the arc of that. So the answer is yeah, there was a response; it wasn't terribly effective in controlling the sheriff's behavior because he has placed himself above the law, and because the mechanisms for dealing with that are slow. But, it is now before the attorney general. There's some



attorney general in San Diego whose job is to review the filing and decide whether or not he should prosecute me. So I'm still under threat of arrest, but I don't really expect to be arrested since Del Mese has testified that everybody- all the professionals who looked at it said there's no crime here, including the sheriff's internal people. So, you know, it's an elaborate process. I apologize for the long answer, but--

**Herrera:** No that's okay. And I--

**Huntsman:** The complete answer is even longer, so I'm gonna stop there. But yeah, there was a reaction, but it's, you know, it's complex and it hasn't changed the situation completely.

**Herrera:** And so my question is, does that end up dovetailing with the racially biased emails and some of this other stuff? Is that- Do they dovetail together or is it, this happened and then there's a chunk of time where there's not as much going on and--

**Huntsman:** No no, there wasn't a chunk of time. I mean, I haven't gone into all the details regarding all the things the sheriff has done, endlessly since then. But the fact of the matter is, there hasn't been a chunk of empty time. The thing I described happened. He then went to, you know, he runs the sheriff's department, so events happen. We report on things. There's discussions publicly. He has a number of times attacked me in the press, claimed that I am corrupt and that I'm a liar. We had a number of run-ins at the Civilian Oversight Commission. They kept- the sheriff just kept sending his staff there to say, 'When Max tells you that he's not getting cooperation in his investigations, that's not true. We give him everything he asks for.' So I had to present to the Civilian Oversight Commission a series of emails in a PowerPoint - I provided the emails detailing the numerous requests we've made and showing the email responses showing that they never gave it to us. And I had to do that twice. The first time was in a presentation to the Civilian Oversight Commission and then a year later I issued a formal report that's up on my website called Unlawful Conduct At the Sheriff's Department and it details a whole series of our investigations that were thwarted as a result of the failure to provide information.

So the false narrative that he's put out to the public, is that I'm a liar and he still to this day continues to do that. And that's gone on nonstop and it's been supplemented by a tax on other individuals: Sachi Hamai, the former Chief Executive Officer of the county, ran afoul of him because he tried to get money for a PR firm within the sheriff's department and she refused to give that to him and then he targeted her, first claiming that she was refusing to provide sick-time benefits to his deputies if they



got COVID, which wasn't true. Department heads get to decide who gets sick time and who doesn't, not the CEO, and he never retracted that. And then he actually again claimed she committed a crime. She was on the Board of Directors for the United Way, a volunteer position, and he had a press conference in which he said she voted, or participated in putting up.. I think it was a homelessness initiative on the ballot that United way liked, because they might get some money out of it, therefore it's a conflict of interest. Government Code 1090, the provision that governs conflicts of interest relating to contracts, requires that you have a financial interest. In other words, if you're a volunteer on a board for a nonprofit, it's not triggered, and the sheriff knows that; I know he knows that because his secret police squad put together a report that claimed she was a criminal, and in it they acknowledged the absence of that evidence but still claimed that she had a conflict somehow that she kept secret. And they submitted that up to the AG as well, and publicly accused her of this. And she ended up- When she retired, she got a settlement from the County with an agreement that she'll get security because of the sheriff's threats and threats that she received and other County officials have received after he publicly sets them up for targeting. Because he has an extremist base that will react to whatever he says. So at one point he accused Mary Wickham of County Counsel of going rogue, because she was advising him that what he was doing was illegal, and the next day she got a threatening phone call, from some folks who claimed that there was an arrest warrant out for her and she was going to be arrested. And the phone call came from the Sheriff's Department. And they said 'No no no, it was spoofed, it's not true' and later they claimed that they had done something about it, but they never provided the evidence or the phone records. So she- until the day she retired, she believed that she was being targeted by people as a result of the sheriff's threats.

So he took a series of actions throughout this time that have never stopped, including targeting Patty Giggans, who's the head of a group called Peace Over Violence, and Sheila Kuehl, a supervisor - they are political allies, I think, or friends, from way back. He claimed through conversations with a guy named Adam Lowe, whose wife used to work at the Metro, that there was a conflict of interest in a contract that Patty Giggans had and he got a search warrant to serve and search the Metro and the Metro's Inspector General and a bunch of stuff. And again, there was public allegations of misconduct, all based on the statements of this guy Adam Lowe, who had filed the lawsuit, which didn't go anywhere, and had been investigated by the Inspector General in that organization. And he used all that as a basis to then make Sheila Kuehl think that she was going to be arrested.

So he's done a series of things like that that haven't really stopped, nonstop. And so I do think- the thing that I'm talking about now is just the latest in a long line of them. It's not like he was silent for a while and then popped back up. And that's why I sent you before this conversation that email I'd gotten with the post recently from Adam Lowe in which he details in his letter to Merrick Garland, you know, all these- his complaints about various things, including using my name as Max-Gustaf and then at some point Max-Gustof, spelling it a third way--

**Herrera:** I saw that.

**Huntsman:** --and a variety of stuff. Well that guy, Adam Lowe, is the affiant in the warrant that they served on Peace Over Violence and Met News. So when we get into more detail about the actual CPOE claim and the holocaust accusation, which is the second thing I sent you -his claim that I'm a holocaust denier- I think he gets that from Adam Lowe. I think Adam Lowe is his supposed source based on my reading of that document that you saw, as well as other things that Adam Lowe has said. Before the sheriff ever in that communication to the department called me Max-Gustaf, Adam Lowe had used that name as well and nobody else had. Nobody else calls me that.

**Herrera:** And I want to definitely get to the Adam Lowe. I appreciate you sending me that email and I looked it over. I did want to look at- talk to you about the email that, you know, that was kind of the genesis for this complaint itself, right? So my understanding is that there was an email that was sent by the sheriff. Can you give me some more information? And I don't think it has the date, the information that I have I don't know that I have the date of the email, so do you have--

**Huntsman:** I saw you don't have it. I thought I had forwarded it and so you should've received it. I can try to track it down for you and try to get you another copy. But bas- I don't remember the date. It was earlier this year. But when he sent it, it was- you know, one of the points when he was attacking me publicly, it was sent around to the whole department, I believe, and he again accused me of - I forget what the particular issue is 'cause he accuses me of lying or being corrupt or, you know, whatever - but in that email he referred to me as Max-Gustaf with a Max-hyphen-Gustaf, and that's the thing that caused me to report it, to the CPOE because I believe he was intentionally- He has a base of extremist groups - white supremacists basically - who he dog whistles to and lets them know who their current target is, and that's how he got Mary Wickham to be targeted; that's why Sachi Hamai had to get security; and by saying Max-Gustaf, I believe he was trying to say to those guys 'This guy's a foreigner; he's either German or Jewish or

both' and we now know with the Holocaust denier thing, he wasn't trying to sell to anybody that I was Jewish because he was claiming that I denied the Holocaust. But I think that my German descent was what made me a target for him because I would be an easy target, in the same manner that he targeted Esther Lim, I believe, because she was an easy target. He liked to target a lot of people, anybody who was a critic of his, but some people because of their race are easier for him to set up as scapegoats with his base who listen to him, including people within the department.

**Herrera:** Actually with Esther Lim, I believe he sent out something in the past where - I don't know if you're aware of it - I think where he looked at her Twitter feed.

**Huntsman:** Oh I'm very much aware of it.

**Herrera:** Right. And where--

**Huntsman:** I don't know, because my ability to investigate has been obstructed, but if I were investigating, I would investigate my belief that that's part of what he has that dirty tricks squad doing. They're supposedly investigating crime and the sheriff uses his criminal investigative authority as his shield to tell 'Nobody can ask any questions about what I'm doing'. But what I think they're doing is political work. And he had somebody go through all of Esther Lim's social media to mine statements that he thought were obnoxious. And then he put them together in a long list and sent them.. a year and some change ago to the Board, particularly to Supervisor Solis, Esther Lim's boss, to complain about her. And then a year later, more recently, he sent it again. And that was after he had taken the shot at the Chinese company that was providing COVID testing. Part of his sort of strategy for remaining sheriff is to appeal to the deputies' union and he described to Gustavo Ariano of the Times, his staff as being 80% conservative and right-wing. Now, I'm not sure that that estimate's correct, but that's his viewpoint of his staff. I do know that there is a certain percentage of his staff who are very extremist on the right and who are very anti-Chinese, and he was using that racial component to try to beef up his standing with them, and with voters who- the right wing of voters who he thinks he can get to reelect him. But at the same time, it creates, I think, a great danger to the, the people he targets because these folks are- these are dangerous people. And so that's why I connect these events. What he did with Esther, I don't think that's a coincidence. Now he could've done it with anybody and he could've done it irrespective of race. But I think he targeted her because she's Chinese.

**Herrera:** Do you have any sense of how many people he has on this squad or, or how many people are [indiscernible]?

**Huntsman:** I think it's about a half dozen or so and I think it's changed a little bit over time. In the early days when he first started it, he hired a guy back to the Sheriff's Department called Lillienfeld and he was a guy - I don't know if you're familiar with him, but - if you were to Google him, you'd see that he had left the Sheriff's Department years ago and he went to work for the DA's office on a contract basis, and he got caught sneaking into the jails. He put on his old sheriff's uniform and snuck into the jails in order to bring contraband to an informant. He did it for the cause of good and justice, because he wanted this informant to help him with a murder case for the DA's office. And the contraband was, supposedly just a burrito -although nobody knows because he snuck it in- but he did it after being told no, he couldn't do it, by the Sheriff's Department. And then he used his old uniform to pretend that, you know, that he had permission and snuck in contraband.

**Herrera:** Can you spell his name again?

**Huntsman:** Lillienfeld?

**Herrera:** Okay, there you go. I've heard- I just didn't hear it, yeah.

**Huntsman:** Yeah, and that happened. I mean, it's on video. What you think about it is questionable, but the event happened. So he rehired that guy and I think he rehired him because he knew this is a guy who'll do whatever I ask him to do. He'll pull out every stop. And he put him in this unit and he also had a guy who's a computer guy, and the computer guy did a lot of computer work for him. Allegedly, I've heard numerous times over the years that he's bugging my emails and, you know, accessing stuff. I'm not sure I believe it, but I have a bug sweeper in my office as a result that I use from time to time, to try to, you know, at least have some kind of protection against it. But other people do believe it and I've been told that over and over. That guy's on the crew. So I wouldn't be surprised if that team was put onto the process of gathering stuff. But the sheriff has a lot- also has- I mentioned the PR firm he wanted to have the county pay for for him. He never got that. So instead he converted the Sheriff's Information Bureau, which is supposed to provide information to the public, which the sheriff has a legal duty to provide and doesn't, he turned them into his PR firm. So they're run by- or were run by a guy named Satterfield, a deputy, now a captain I think, because he's been promoted, who would put out PR stuff for the sheriff on a nonstop basis. And it's possible that that team did the work as well.

But it's also possible it was done as a supposed criminal investigation. I haven't been able to investigate that. But the bottom line is, I think he collects dirt on his political opponents and then tries to figure out a way to hurt them and he turns most easily to race-based techniques 'cause I think it plays with the people he's trying to curry favor with and he uses whatever means are available to him to do that including public funds for- that should be used for criminal investigation or, in the case of SIB, should be used for Public Records Act requests, you know, all sorts of things. So that's kinda the way I see it unfolding and why I see these things as connected.

**Herrera:** And in terms of your name being Max-Gustaf Huntsman, is that.. a name that you've ever used publicly? Like, as your name?

**Huntsman:** The story of my name is that when I was born I was named Max-Gustaf Edler. My dad was German, and he came- his dad was a soldier with the Nazis, and he supposedly couldn't carry a gun 'cause he had employed Jews before the war, but they lived in Nazi Germany. His older brother hid in the woods to avoid being conscripted and when the war was over, he decided that was not a good place to hang out. So he came to Canada and then he came down to San Francisco, where he met my mom and fathered me. And he wanted to name me a German name. They settled on Max-Gustaf, which was a hyphenated name of two uncles of his; Max was one of 'em and Gustaf was the other. The F that's in that name is the Swedish spelling of Gustav and that's 'cause this guy just happened to have the Swedish spelling; I don't know why. This is all stories I've heard from my dad. My dad quit working when I was born, was doing a lot of drugs, once left me on a street corner to teach me to be self-reliant and after my mom and my dad got divorced, not long after that she moved down to LA to get away from him.

After that, he left America. He went to New York for a bit and then he went to Sweden and got himself a real family, and lived 'til the day he died in Sweden taking care of a family. He didn't do that with my family and I believe that's because of Nazi Germany. I believe he was raised with a violent hatred for authority. He was an amateur boxer and, you know, he liked punching people. He was a con artist. He actually supposedly did some time in custody. I mean, he was just a piece of work - as a result of the Holocaust. Not what was done to the Jews but the way Nazis functioned, and I think they did a lot of damage. I don't claim that's as bad as the Holocaust, but it had a direct impact on me. So the idea that I would deny the Holocaust is crazy. I have no love for Nazi Germany; quite the opposite.

But back to the name part. So he names me Max-Gustaf Edler. When I was a kid, I said to my mom--

**Herrera:** I'm sorry, Max-Gustaf, what was the last name?

**Huntsman:** Edler. I pronounce it A-dler because that's the German pronunciation and I'm telling you about the early life.

**Herrera:** And how is that spelled?

**Huntsman:** E-D-L-E-R.

**Herrera:** Okay. Sorry.

**Huntsman:** And that's- Gustaf is a first name with a hyphen. I have no middle name, never had a middle name.

**Herrera:** Got it.

**Huntsman:** So when I was a kid, I told my mom, 'I don't want to have the name Edler. That's my dad's name. I don't like my dad. I like you. You raised me.' Sorry, I get a little emotional about this - I apologize - when I think about it. My mom said 'no'. She said 'When you grow up, you can do whatever you want, but until then I'm not changing your name.' So when I grew up - and by growing up, I mean I went to law school, and I was a law clerk at the firm Tuttle & Taylor, that Jerry Brown used to work at many years ago. And I got one of the partners there to help me change my name. And I went into court and legally changed it, from- to Huntsman from Edler. I didn't get rid of the Max-Gustaf legally. So I was Max-Gustaf Huntsman on paper. I never used Max-Gustaf and nobody ever knew me by that. I just went by Max. And when I became the inspector general, I got lucky and I- I can't really tell you how this happened, but one way or another- 'cause I would use Max and I would write Max on most things, but like on my tax returns I'd write Max-Gustaf and the state bar had me down as Max-Gustaf. So, like, you know, my formal name was Max-Gustaf; I never hardly used it.

Somehow or another I got a passport that had Max on it, just Max and not Max-Gustaf, and so as a result, under California law you can't change your name unless you go to court and do a bunch of things that I didn't want to do, unless you have some documents to show that your name is this other thing. So as soon as I had a passport that said Max on it, I was able to go into the DMV and go, 'Look, my name's Max,' and they changed my name to Max. And I was able to go to the County and say, 'Look, my name is Max' and they changed my name to Max. So I



changed my name everywhere to Max. But on some obscure county computers, they never changed it correctly and the state bar still had me down as Max-Gustaf. But in all other contexts: federal government, county government it's Max and I never ever use Max-Gustaf to talk to anybody. Nobody would ever tell you, 'Oh that guy's name is Max-Gustaf.' There is one cop I used to work with in the DA's office who used to call me Goose just as a joke, and that was it.

But I'd never gotten the state bar changed until the sheriff did this and then I called them up and said, 'Guys, can you pull that?' So they said, 'Yes, yes we'll make you Max.' Now if you run me on the state bar, there's an entry for a guy named Max Huntsman and there's an entry for a guy named Max-Gustaf Huntsman, 'cause they didn't change it; they just stuck another one in. So that's the story of how I use my name and that- it's a long slow burn, all from the fact that I didn't particularly like my dad very much. And I didn't want to have anything to do with him. When I got to turn over a new leaf as inspector general, I, 'you know what, I'm just dropping that -Gustaf part. I won't even do that,' 'cause I'm not a German. I've got nothing against Germans particularly, aside from Nazis, but I'm not one; I'm an American. He came from Europe and, you know, my mom raised me here in America and, you know, that's who I am. So anyway, that's my story.

**Herrera:** And what's your mom's heritage?

**Huntsman:** Well, her dad came from Canada - white, generic white. Her dad came from Canada. He had come back years earlier from Scotland. I think he actually came from Scotland or maybe his dad's dad did or something. But he, he came down out of Canada and on the other side, on my grandmother's side, they were, like, Daughters of the American Revolution. Her family had been here, like, before the American Revolution. They came- supposedly the story- my daughter tells me this isn't true, but my story was that we were related to John Rolf of the Pocahontas story, 'cause one of our ancestors was Rolf, but my daughter looked into it and said, 'No that guy had no kids. So you might be related to him, but you're not a descendant of him.' But in any event, they were just Americans, you know, white European-type Americans but not, not anything else.

**Herrera:** Would that be British if they were Daughters of the American Revolution?

**Huntsman:** That side, on that side. If you want to divide me up, on my mom's side it's half British with a little bit of, like, French or something in there, and on my mom's dad's side, it's mainly Scottish. So it's like British Scottish

on her side and then on my dad's side, he's pretty much German with a little bit of Russian and I think a little bit of Polish.

**Herrera:** Okay.

**Huntsman:** But in terms of culture, he didn't raise me with any kind of German culture or anything and my mom, by the time, you know- my mom was a hippie. She was a beatnik; she wasn't a hippie. She was before the hippies.

**Herrera:** San Francisco.

**Huntsman:** Yeah exactly. I was conceived on a houseboat in Mill Valley. You can't get more beatnik than that.

**Herrera:** That's a very auspicious beginning.

**Huntsman:** So, you know, that, to the extent that I have a culture, that's my culture. And I've had this conversation with people, you know, I don't feel- I feel like I'm a cultureless person, other than being an American. It's not like it's a supremacy thing at all. I'm not in favor of that approach. I'm jealous of people who have a real culture. And so it's a thing that I wish that I had and I think that's part of my own read psychology 'cause of my dad. But the bottom line is, I'm not German.

**Herrera:** Right. Now, my understanding is that there was a KFI.. So there was the email that went out and do you recall who that email went to that the sheriff had sent?

**Huntsman:** I think it was the entire sheriff's department. I'll have to track it down for you since you didn't get it. I sent it in to CPOE and I'm sure I've got a copy of it somewhere.

**Herrera:** I can hunt it down myself as well. I just didn't want to delay talking to you because I think it [indiscernible].

**Huntsman:** No no no, it's not important. But it was- Yeah, it was- I think it was sent out to the entire Sheriff's Department. But it's not, it's not- There's more than one time he used that Max-Gustaf, and he talked about it, and I think on KFI he talked about, 'Oh we need to look into why, why did he change his name? What's he trying to hide?' you know. And so, to be clear, like I said, I gave you the reason I changed my name. Since 1991 I've worked for the county and was a deputy district attorney for 20 years before I was this. I'm not hiding a secret past. You know, there's no fraud or process by which I changed it in order to conceal who I am

in any way, shape or form. It's just I don't like to be associated with a culture that I'm not part of.

**Herrera:** You mentioned - and I didn't ask this, but - so you were a deputy DA prior to becoming the IG? How long were you with the DA's office?

**Huntsman:** When I graduated law school in 1991, I joined the DA's office before I passed the bar and I was a DA- once I passed the bar, I became a DA and then I stayed there until 2013, when I took the job as Inspector General.

**Herrera:** So when you changed your name, was that while you were in law school? Like, was that a job decision?

**Huntsman:** Yeah, that was- I became Huntsman before I joined the DA's office. So as a kid I'd been Edler; when I was in law school I was Edler until, like, my senior year and then I was Huntsman. And then when I graduated from law school and joined the DA's office, I was Huntsman. So nobody in the DA's office ever knew me as Edler.

**Herrera:** Okay, got it. Because you mentioned you worked at Jerry Brown's old law firm, so I just wasn't sure of the timing of that. Was that during law school?

**Huntsman:** I was a senior- not senior, a summer law clerk after my second year of law school.

**Herrera:** And so.. aside from the email- So then the KFI, the KFI radio call, do you recall what was said during that KFI radio appearance? And was there more than one or is it just one appearance?

**Huntsman:** I don't now recall. On KFI he talked about it and, like I said, it used to be kind of clear in my head, but then when he went to the Times Editorial Board and told them I was a Holocaust denier, it kind of made the details of what he said about my name irrelevant to me. So I don't remember precisely what he said on KFI.

**Herrera:** You did say something to the effect of, you know, that they should look into why he changed his name or what is he trying to hide?

**Huntsman:** Yeah, I mentioned that. He said that somewhere; I think that may have been on KFI. I don't remember now where he said that, but that's, like, a thing he likes to say and he said the same thing to the Board. But he likes to say, 'Well, somebody should look into that.' He does- he's very fond of, like, Facebook Live videos and Instagram videos in which he'll

have, like, a chat and he'll sit there at his desk and he'll pull pieces of paper and talk about them, like a talk-show host or something, and then just sort of ruminate about them. That's how he talked about Sachi Hamai when he accused her of the 1090 violation. He said, 'Woah, I just got this in from.. from Vivian, oh thank you. Oh, somebody should look into this,' you know. And he effects this kind of casual way of talking about things and I think it was in the same context. He said, 'Somebody should look into that,' as sort of a vague allegation that there's some nefarious reason for why my name changed.

**Herrera:** Did you feel like he was casting aspersions or trying to make some type of negative inference?

**Huntsman:** Yeah, absolutely. Yeah, definitely.

**Herrera:** And I know you mentioned that you believe it may have been, like, for example, a dog whistle, but if his people are these radical, maybe right-wing, wouldn't that be more in line with their viewpoint if you were.. you know?

**Huntsman:** It might be if he had presented me as an Aryan, but he didn't, you know. So that's why when he first did it, my take on it was he was trying to imply I was Jewish. And that would be what I was- that's what I thought he was doing. I may not have been correct about that, but that's just- that's how I took it. And so that's the way I took it. What I think was really going on- I mean, again, it's, being a foreigner I think is the main thing. So you're right; if white supremacists really cared about, you know, true Nazism, then none of them would qualify because most of us here in America are not the Aryans that the Third Reich was obsessed with. But that's not how we look at the world.

**Herrera:** Maybe the Third Reich weren't all that Aryan either.

**Huntsman:** Right, exactly. That's my understanding too, but you know, that's ancient history, but for here and now, I think it's really more about an ideology and a way of looking at things and again, I think he was simply designating me as a target and as an 'other' and he didn't really care too much about how people took it. Other than they knew: this is a guy who is an enemy of ours. In the same way that recently the Board had voted to, put before the voters the right to remove the sheriff with a four-fifths vote. As soon as that happened, that was put out on Breitbart, the highly conservative outlet, about it and how Democrats were trying to take away the rights of, you know, a favored sheriff, and immediately there started to be a series of Twitter feeds from right-wing extremists in Florida and other places talking about how outrageous it was. I think

that's the technique that the sheriff uses. It's more about designating the target than about the details of why deputy designated. I think he selected these things because they play well, because the race angle plays well.

But now in hindsight, I think he probably had already had a bunch of conversations with Adam Lowe about not just the name but about the Holocaust-denying claim. And so I think really he was setting that up. But at the time, I didn't know that. I thought what he was doing was just trying to make me look like, you know, I'm the target. But I think really what was going on was he was preparing for the next one. And of course, it's weird to say somebody's Jewish and a Holocaust denier. So I assume that was not his plan. But again, I think he's getting this stuff from Adam Lowe, who's a little bit crazy I think. From the document you saw, you know, he's- When we subpoenaed from him, he had an interchange with Lillienfeld, the guy I talked about before, when Lillienfeld recorded him- or, Adam Lowe recorded Lillienfeld while Lillienfeld was kind of threatening Adam Lowe, telling him to back off 'cause he had sent some emails to Murakami. And so Lillienfeld had been dispatched, or voluntarily dispatched himself, to tell Adam Lowe to settle down. Adam Lowe recorded it all; we subpoenaed it; he refused to provide it; and I think that's when I got on Adam Lowe's radar as somebody he was going to target. And I think the sheriff had already, taken Adam Lowe as an ally, used him in his process to try to get a search warrant.

So I think he got from Adam Lowe the 'Hey I think I've got some dirt on Huntsman. I think he's a Holocaust denier. I think he's a bad guy, this is what I think.' I don't know where he gets that from because I have never denied the Holocaust. There isn't some old college paper that I wrote in which I question the Holocaust. You know, it never happened. My guess is that Adam Lowe ran some database and found some name that sounds kind of German, you know, of somebody who denied the Holocaust. But it sure wasn't me.

**Herrera:** So with regards to, for example, once the email the sheriff sent and then, for example, the KFI, the radio show he's making these statements, did you receive any type of emails or any type of calls or any type of negative attention? Have you received any kind of...

**Huntsman:** Once he accused me of being a Holocaust denier to the LA Times, you know, in a very public way and it became an Op Ed in the Times and a whole discussion, and a number of media sources talked about it because it was such an outrageous claim, especially - I don't know if you watched the video of that, but if you think it's relevant, you might

want to pull up the video - but that Op Ed I sent you kind of encapsulates it. They asked him, 'What's your evidence for that?' He said, 'Well I'm not going to tell you.' And they said, 'Well if you're going to accuse somebody of such a horrible thing but not provide any evidence, should we believe you?' And he said, 'Yes you should believe me.' I mean, it was kinda nutty, so it became a story. After that, I did not receive any death threats or any weird emails from crazy people any more than usual. I certainly have had an increase in, like, when I monitor comments on, certain websites like Witness LA or other places, where there's always kind of a chatter and I'm always kind of the enemy in the eyes of these extremists. I mean, there's certainly stuff like that, but there wasn't a lot of Holocaust stuff because - I shouldn't say because - the sheriff had previously already presented me as sort of his main enemy and there's always been a lot of attacks on me like that. But I didn't- I didn't notice any that were specifically Holocaust-related. I did receive a lot of communications from people I know who, you know, expressions of sympathy and ironically most of them from friends of mine who are Jewish. Because I think if you're Jewish, you know how disgusting and deeply offensive that allegation is. I think if you're not Jewish, it seems wrong to say that about somebody, and if you're Jewish, it's evil. And so a number of my friends who are Jewish were like, 'Oh my God, Max, I can't believe you said that. That's horrible,' you know. And so it's actually been a pretty positive thing.

I sent an email to the Board about it, which is what I kind of forwarded to CPOE, to go on the record and say, 'Look, it's not true,' because it hurt me so deeply, for the reasons I described. I'm not Jewish, but I have a certain connection to the Holocaust that is not positive. And so I take it to heart more than maybe I otherwise would. I don't know. I don't know what a person would think if they were called that, if they had no connection, I don't know. But all I can tell you is emotionally for me it was hideous. It's still hideous. Like I say, I was tearing up talking about it. But when I was tearing up when we were talking, that wasn't because of the Holocaust; that was because of my history, my dad. I'm like an eggshell plaintiff in this. It's not just the threat and the insult and the allegation; it's what it means to me personally.

**Herrera:** Can I take just a one-minute break? I locked my husband out of the house, so (laughs).

**Huntsman:** I'll just sit here. Go ahead, don't touch anything and come on back when you're ready.

**Herrera:** I'm so sorry. I'll be right back. I'm just going off the record at 3:15.



**Herrera:** Back on the record. It's 3:16. So, my understanding is that I think on March 31<sup>st</sup>, you sent - or was it 30<sup>th</sup> - you sent an email to, is it- I don't know what the DCO stands for: Deputy Chief Officer Seiberg, or Seeberg? - regarding the Editorial Board comments, the comments to the Times about being a Holocaust denier, do you recall doing that?

**Huntsman:** Can you give me the spelling of the name you're saying?

**Herrera:** S-I-E-B-E-R-G.

**Huntsman:** I'm sorry, I don't know who that is. I probably did do something that created what you're talking about and, as I recall it, I sent an email to the Board and then I decided 'No, I'd better tell this to CPOE because it' - Oh I think you're fro-, no you're there; I was afraid you were frozen - 'I think I'd better tell it to CPOE because not only, not that I'm complaining about it because, for the reasons we discussed in the beginning, I'm very cynical about whether or not the sheriff is going to discipline himself, but I figured I had a duty to my employees to do something about this because CPOE rules are pretty strict about reporting when you're aware of certain facts.

**Herrera:** Right.

**Huntsman:** So I sent it- I would've said I sent it to Vicky Bane, who's the head of CPOE, but I'll bet you whatever I sent somehow generated the thing that you're referring to.

**Herrera:** Okay. And then, I think as a followup--

**Huntsman:** Unless Seiberg is Sheriff's Department. That could be an echo of what I sent.

**Herrera:** It could be.

**Huntsman:** It could be, 'cause I sent something to Vicky Bane. The process for CPOE for everybody else in the county is the CPOE investigates. For the sheriff's, they get to investigate themselves. So whenever there's a CPOE complaint regarding the sheriff, they forward it to the sheriff. So that may be the forwarding from the county CPOE to the sheriff's department.

**Herrera:** Right. And then it makes reference to.. I think on April 1<sup>st</sup> you communicated with this person and it may be that they are in the sheriff's office, stating that 'I'm not blaming you, but be sure to tell all

the victims you interview that the LASD CPOE process is not confidential and the sheriff will discuss them with the media.' So I think that gets into that last point of...

**Huntsman:** That person is the person I told you about who I talked to at the sheriff's department. She called me and then set up an interview and we had an interview, and we went through the same thing I'm going through with you. Not all of it at that point, but he had at the Times said, in addition to the Holocaust thing, he said, 'and Max Huntsman's made a CPOE complaint against me, ha ha.' So that's why I said that to her. I'm, like, 'Look, the whole claim that it's confidential is a joke. The sheriff already was informed about it and he already told the public.' So.

**Herrera:** Okay, now I see what you're saying about the confidentiality, because I wasn't sure what you were referring to, but that makes sense.

**Huntsman:** I was referring to his public announcement, the Times Editorial Board, that I had made a CPOE complaint against him. Which is completely in violation of CPOE rules. So that- I apologize, but--

**Herrera:** Not only they would be--

**Huntsman:** --I'm a little cynical about the sheriff's process and whether or not it was going to be confidential.

**Herrera:** Right. I can only tell you that, I'm not talking to the sheriff. I guarantee that I'm probably not going to be his favorite person.

**Huntsman:** No I understand now. I understand- it was the admonition you gave me 'from the Sheriff's Department' that threw me off for a minute.

**Herrera:** Yeah and I apologize.

**Huntsman:** Probably already, you get hired by County Counsel; County Counsel gave you a task: you're going to collect a bunch of stuff, you're going to give it back to County Counsel. If anybody tells the sheriff anything, it's going to be County Counsel. And to be clear, it doesn't matter. The sheriff already knows all these things. The sheriff knows that I'm no fan of his because I- Sorry, my phone froze for a moment - the sheriff knows because I publicly record all my criticism of him, so he knows how I feel. So if you did call up the sheriff right now and tell him that, it wouldn't do anything worse to me. He already is, you know, fixated on me as much as he is ever going to be. It's just that I'm really- As the Inspector General for the county, and it's my job to protect the constitutional and other rights of our employees and the public from the

sheriff, when I'm aware that the sheriff is simply disregarding the rules of CPOE so he can target individuals, people like Esther Lim come to mind. You know, I get paid for this. I used to be a prosecutor. I get paid to take on armed men and do gang busting. She doesn't, nor do any of the other people who he's targeted. So that's why I was a little frustrated with that whole process because it's just- it's so unfair and it's so dishonest, to the people within government service than when we allow somebody like this to engage in this conduct, you know. It just is very disheartening to me, to be a process that CPOE- I've been involved with in my office, and worked with CPOE in investigations and found them to be completely above reproach in their confidentiality and reasonableness in how they deal with things: very careful, very thoughtful, very sensitive to those making complaints and those who are being complained about and, you know, carefully gathering facts, and then crafting the solution that's going to protect people. I mean, it's an amazing process - until you hand it over to the sheriff. So that was my point.

**Herrera:** Okay, so that makes sense. Now I get it. And then- just going back- I think we're almost done, but going back to Adam Lowe, I just want a little bit more information about who exactly he is 'cause I did read - and again, thank you for what you had sent to me - but I'm trying to understand exactly who he is and what your relation or contact has been with him.

**Huntsman:** Adam Lowe is the husband of a woman who was employed by Metro. Metro is basically a joint powers agency that's sort of controlled by the county, sort of controlled by LA City and its Board includes, by law, I think two supervisors at a time and they rotate, or whatever, as well as some other folks. They have an inspector general; they have a executive director and they run, you know, the Metro system. So, Adam Lowe's wife was an employee there and she was unhappy. I don't know the details of why, but she didn't feel that she was being treated properly. And she started to complain about that and eventually she quit or was fired or what have you. And once that happened, he made a campaign of attacking first the executive director, a guy named Washington, who is mentioned in that letter that I sent to you; and then somewhere along the line he decided that he was aware of a great corruption and that he needed to let people know. And I think the theory in his head was, this corruption was why my wife got fired, or not treated properly and had to quit, because she was a whistleblower about this and therefore, if I can convince people that this is true, then they will see that my wife is a victim and they will give her money or a new job or whatever.

He filed a federal lawsuit; he spoke to every media outlet that would ever listen to him; and my first relationship with him was maybe a year, two years ago - I forget how long, it was a long time ago - where he stuck me on one of his email lists and he would periodically send out these emails to everybody, I mean, to anybody he could think of to stick on there including the media and he sent out these emails saying, 'You know, I've got the goods. I'm meeting with the FBI tomorrow. I've just given all this stuff to the Grand Jury.' You know, all these claims that, having experience as a corruption prosecutor, I was pretty sure were not true. 'Cause that's not how it works, you know. But in any event, he was saying these things and I remember reading these allegations. Now the allegations were that Sheila Kuehl, in her position as a Board member at the Metro, had caused the issuance of a contract to Patty Giggans' group Peace Over Violence. It is true that Peace Over Violence had a contract with the Metro to provide sexual assault hotline services. I don't think Sheila Kuehl had anything to do with him getting it. I don't know that, but I don't think she did. And again, back to our conflict of interest stuff, I'm not aware of any flow of money that would close that circle, that would prevent Sheila Kuehl from causing Patty Giggans to get a benefit like that; unless Patty Giggans gives her money, right? You can give campaign contributions - that's totally okay. It's crazy, but in American California law, that's okay - but you can't, like, give them a hundred thousand dollars to put into their personal account, or hire them for some other job. So, as far as I know, there's no connection like that.

But that was the claim, was that that contract was somehow bad, and it was looked into by the IG at the Metro, I understand - I don't- haven't read that report - and there was an element of the claim that was interesting, which was that not only was the creation of the contract flawed but also the contract itself was fraudulent. And supposedly the basis for this - and I don't know if it's factually true or not, but this was the claim - was that, you know, when you look at how many calls they've gotten on their hotline? It's not a lot of calls. And they're getting paid by a flat rate or some certain amount of money and if you work out how much it is per call, it's a really small number- I mean it's a really large number. They're getting paid way too much money for each call. And so therefore this is not in the interest of the public and it's a rip-off. That was basically the claim. So he made that claim; he tried to sell it and federal lawsuit didn't go anywhere; it was eventually dismissed. He sent it out to all the media outlets to people like me, to see who would, you know, champion this cause. Nobody. Until he got the attention of the sheriff, and the sheriff I think referred him to his dirty tricks squad and said, 'Hey, this guy has something bad to say about one of the people who has oversight over me, Sheila Kuehl, and Patty Giggans',

who was at the time the chairman of the Civilian Oversight Commission. And I think they went to town on it. They got a warrant. There's a whole bunch of litigation regarding that warrant and blah blah blah, so on and so forth, and the warrant included getting personal identifying information for the people who called the hotline, even though the hotline's supposed to be confidential, and they wanted to get the names and contact information for all the people who'd called the hotline, and they got a judge to sign off on that, whatever. So that's how Adam Lowe came into my life and how he became relevant.

And a bunch of things happened after that. Eventually he had that conversation with Lillienfeld, which he- and then he took the tape and put it out on the internet. And we tried to get a copy of it after he put it on the internet and he refused to give it to us and wrote a bunch of weird.. things that looked like motions, like legal motions, but he didn't file them or anything; he just sent them to us. He never showed up, so he's in contempt of court except that we haven't certified it to the court. We told the Attorney General's office 'cause I figured, you know what, at the end of the day I don't have the power to do anything. If Lillienfeld is shaking down citizens with threats from Murakami, I can't do anything about it. I've told the public 'til I'm blue in the face about the illegal things happening at the Sheriff's Department. I've told the Attorney General; I've told the DA's office. You know, what's the point? If they want to go get that recording and litigate it, they can. I've got more important things to litigate. So that was the Adam Lowe thing, but once we subpoenaed that from Adam Lowe, he came to dislike me immensely. And so in that letter, as you can see, he said that I'm harassing his family and doing horrible things. The only thing we did is we served him with a subpoena.

**Herrera:** [unintelligible 12447] saying that you had an obligation to investigate Sheila Kuehl or anything like that, in your capacity as an IG or in oversight.

**Huntsman:** No I don't think he said that. I think I ended up just on his email list, because - and I often do - there's a lot of people - not a lot, but a few - very enthusiastic people who might be insane, but I don't know, who send regular emails and they attach me on because I have an interesting title that sounds like I might care. And so I get, like, stuff about the Veterans Administration all the time. It has nothing to do with me. So I don't know that he thought I had any direct responsibility including, I think by now he's had lots of conversations with the sheriff and so he has decided that I'm, you know, part of the evil empire that Sheila Kuehl is running or something. But I don't think in the early days, when he put my name on it, he had any reason to think that I had

responsibility over it or did he ever say that to me. He never said, 'Hey Max, you should investigate this.' He did- I've actually talked to him a couple of times 'cause he runs something called the AMFED. He uses a pseudonym: Jack London, I think, and puts out a bunch of kind of odd things on the internet. And he made some PRA requests and whatnot. And I had some conversations with him and he was relatively straightforward in the early days, before he had decided that I was evil, about [unintelligible 12601] that he was trying to collect and do.

He's an interesting fellow, but I think he's- He used the term Max-Gustaf and even before this letter I'd seen him use it - I forget where or when, but in, like, one of his AMFED things. The Federalist Society of course, you probably know from law school, is a conservative group.

**Herrera:** Personally.

**Huntsman:** The AMFED is I think something he just made up, but I think he uses that term because he's a sort of conservative- he views himself as a conservative commentator. I don't know if he really is, but that's kind of where his sympathies seem to lie, but I don't- you know, he hasn't said.

**Herrera:** And it sounds like the only place where you might've had a public.. where the name Max-Gustaf was used publicly was the maybe the state bar.

**Huntsman:** Yeah, if you look me up on the state bar, it used to say Max-Gustaf; now it says Max-Gustaf or Max, depending on which one you pull up. But before I changed that, which was when this was all going down, if you had, you know, typed an attorney search, it would say Max-Gustaf Huntsman. And so my- I have no basis to know this, but my guess is that Adam Lowe did that: pulled up my name, said 'Hmm this is interesting, I'd better look into this,' and started running my name and, you know. I've done the same thing. I Googled. I was, like, where the hell did he come to this? Is there some guy named Max-Gustaf Edler or Max-Gustaf Huntsman or something who's a Holocaust denier? And I didn't find anything. But I think Adam Lowe has more free time on his hands and I think he probably found some Holocaust denier database that is kept by somebody and found some name on it that is close enough that he decided that's me.

**Herrera:** And you say he used your name in the past. Where do you recall him using your name?



**Huntsman:** Either in email communication or maybe in some posting on the AMFED, but I don't recall precisely where I saw it. I could try to hunt it down.

**Herrera:** So would you say that, if I look at his site there's going to be more than that, like more references to you in his site, that there's more than that?

**Huntsman:** Not much. There's a lot of weird stuff on his site and it's come and gone. He mentioned me on the site once or twice I think, but not in any great detail and I- He might've said Max-Gustaf there, but he might've also done it in one of those emails he sent; I don't remember. All I know is, when the sheriff used Max-Gustaf, I was, like, 'Woah that's weird!' and then I thought, 'Hm, I've seen that before; I've seen that from Adam Lowe' because I think at some point he had used it in passing. But this letter that you see recently where he uses it repeatedly, as Edler in parentheses and then calls me Max-Gustolf, or whatever he does, spells it a different way, that's the first time.

**Herrera:** Oh no, I'm saying okay, yeah.

**Huntsman:** Yeah, that's the first time he's, like, really gone into detail in writing that I've seen. So that kind of makes me think I was right about my guess about where the sheriff got this from, but I don't know.

**Herrera:** And to your knowledge, do you have any sense of whether he's talked to you on KFI more than just the information that you provided in terms of that radio call?

**Huntsman:** The sheriff talking about me on KFI?

**Herrera:** Uh-huh.

**Huntsman:** Oh yeah. Oh no, I gave you just a little tiny bit having to do with this issue. The sheriff talks about me all the time on any media outlet he can: FOX, Hannity, the.. he does an Instagram, does video sometimes, his Facebook videos, and he regularly talks about me 'and my evil ways'. Many many times over the past years.

**Herrera:** And is he referring to you as Max-Gustaf in those talks?

**Huntsman:** I don't know that he does in most cases. When this happened, he- there was a brief time where he seemed to use Max-Gustaf more often, but I think he lost it, his attention wavered a bit and so. Usually in correspondence he'd call me Max Huntsman and he had previous to this until he did that a couple of times, and subsequently he's gone back

to Max Huntsman, with a few exceptions here and there. But in general he does not call me Max. He doesn't, like, every time call me Max-Gustaf and, you know, make a big deal out of it. That's not the case. Usually he calls me Max Huntsman 'cause that's the name I use and that's what people know. If he talks about Max-Gustaf, nobody's going to know who it is. But, now and again he's done it, but not every time at all.

**Herrera:** When he got the scrutiny after the editorial, the comments to the Editorial Board, did he go back to using Max Huntsman?

**Huntsman:** He has, but I didn't get the impression he did it quickly as a reaction or something, but I don't know. Yes, like in letters and things, they still use Max Huntsman, but they never really went away from it. Like I say, he always threw the Max-Gustaf in once or twice, and from that I drew- He knows darn well my name is Max Huntsman. He uses Max Huntsman in formal letters and so he knows. Whenever he uses Max-Gustaf, it's an intentional thing that he's doing to make a point. Like I say, I never got the impression that it was a habit. I don't think he switched to calling me Max-Gustaf all the time. I think he did it in a couple of targeted instances. But yeah, no, he didn't- When he got the heat about the Holocaust thing, he didn't have a lot to say except for when the Times Editorial Board was talking to him, in which he said he had two sources, and he wouldn't say who they were. He didn't talk about it much after that, that I'm aware of. He may have, but I didn't hear about it.

**Herrera:** Is there anything else I should know? Anything that I've missed that I haven't asked you about? I know I've taken a lot of your time and I appreciate you being so available.

**Huntsman:** I appreciate you asking all the questions. I'm sure I could think of lots more things to say, but I don't know that they'd be terribly productive and they'd take up even more of your time, so. I think I've kind of laid things out well enough. I think you get the gist of it and.. I'm available if you have any additional questions in the future.

**Herrera:** Thank you so much. I really appreciate it, and to the extent that there's any other articles or any other thing that you think I should be aware of, you're certainly- more than welcome to email it to me and send it to me. I obviously will be doing my own scouring of the internet to make sure that I've caught any type of references or any other referrals to it. But, you know, certainly with, like, for example, the KFI, you know, I'm probably limited in being able to know how many times he's mentioned you 'cause I don't know that they're really going to catalogue that. So if there's any other instances of that or anything else that you become

aware of, I'd be grateful if you would let me know. But certainly on our end we will make sure that we try to do our best to make sure we capture any other references so that we're aware of any other times where he's made those same kind of references to that.

**Huntsman:** And if it comes up again, I mean, if he starts doing it again or something, I will certainly let you know.

**Herrera:** Great. Oh and.. I did forget my part of the admonition of "retaliation is not tolerated at the county. It is against, obviously, county, state and federal law. If you feel like you're a victim of retaliation in any way, I want you to let me know and I would escalate it to the proper person. Likewise, we ask that you don't retaliate against anyone who is participating in this investigation. All allegations of retaliation are taken very seriously." So.

**Huntsman:** Let me extend to that. Esther and I have talked, about her concerns. She wanted me to be a representative for her when she thought she was going to be interviewed by the Sheriff's Department. So I'm glad that you are doing it and not them. I would very much like to protect her from retaliation. Me? I get retaliated by the sheriff every chance he gets and he would do that independent of this. So he's not going to retaliate against me for this; he's retaliating against me for previous things. So I'm not too worried about that. He's going to do everything he can and nobody can stop it. But Esther Lim, she's in a dangerous spot, you know. So if you ever find yourself in a situation where you're aware of some retaliation against her and there's anything I can do to help with it, please let me know. Because like you say, the County is supposed to stop people from being retaliated against and I think she's much more vulnerable than I am.

**Herrera:** Alright. And, you know, this type of work only works to deal with these types of investigations if you make people- you know, if you protect them and make every effort to maintain the confidentiality and so I am very mindful of that and will, you know, make every effort to.

**Huntsman:** And obviously I'm not the first person you should call because that would be breaking confidentiality.

**Herrera:** Which I wouldn't do.

**Huntsman:** But if in the course of finding something out you learned there is a problem and there's anything that somebody whose title is Inspector General can do to help about it, then tell the appropriate parties, 'Hey you know, Huntsman would jump at the chance to be helpful in this

regard.' I have informants who have had retaliation attempts from the sheriff and I have done things using my official powers to try to put him on notice, that we're watching and done things to try to protect informants myself. So I don't know that there's probably much- I mean, all the things he can do he does from a distance and he's going to do anyway, but, and he probably can't get under the skin and do the things that he does to his own employees, but.. anyway. It's a matter of more concern for me than my own personal retaliation 'cause I, you know, I know he's going to unload on me in every way he can every opportunity he gets and it's independent of this. It's not 'cause of this; it's not retaliation. But her, you know, she's a little bit below his radar and this process could quickly onto his radar and that's of concern. So I just mention it in case you find yourself consulting with County Counsel in an opportunity to suggest something, feel free. Just be aware that I would love to help if I could.

**Herrera:** Thank you so much for that information and I appreciate it. You have a great rest of your day. I'm going to go off the record at 3:38 PM. Have a good day. Thank you.

**Huntsman:** Okay. Bye bye.

**Herrera:** Take care.

HUNTSMAN, MAX (IAB) IV 2558097  
WPU  
plw

# EXHIBITS

# EXHIBIT A



For CISU Use:

(Method of Receipt)

**Online**

**ICMS # 2022-112213**

## COUNTY POLICY OF EQUITY

### REPORT / NOTIFICATION FORM

#### **Methods of Reporting Potential County Policy of Equity (CPOE) Violations:**

1. You may use this form to report a potential violation of the CPOE;
2. File an online complaint at <https://ceop.bos.lacounty.gov> (strongly encouraged);
3. Call the County Intake Specialist Unit (CISU) at (855) 999-CEOP (2367); or
4. Visit the CISU office at the Kenneth Hahn Hall of Administration building located at 500 West Temple Street, Suite B-26, Los Angeles, CA 90012.

---

#### **1. Do you wish to file this complaint anonymously?**

☐

Yes (**Do not check 'Yes' if you are a reporting supervisor/manager**).

☒

No (If no, please proceed to Question #2).

#### **2. Are you filing this complaint for :**

☐

**Yourself** (If filing this complaint for yourself, please start at Section A).

☒

**Someone else** (If you are filing this complaint for someone else, please start at Section A).

☐

**Someone else: I am a reporting supervisor/manager** (please start at Section A).

---

**Note to Supervisors/Managers:** As a County Manager/Supervisor, it is the County's expectation that the CPOE complaint notification be submitted online at <https://ceop.bos.lacounty.gov>.

**Section A: Reporting Party Information**

**Today's Date:** 03/09/2022

<b>Name</b>	<u>MAX HUNTSMAN</u>	<b>Emp #</b>	<u>e410745</u>	<b>Title</b>	<u>INSPECTOR GENERAL (UC)</u>
<b>Work #</b>	<u>[REDACTED]</u>	<b>Mobile #</b>	<u></u>	<b>Work Hrs</b>	<u></u>
				<b>RDO</b>	<u></u>
<b>Department</b>	<u>BOARD OF SUPERVISORS</u>			<b>Dept Head</b>	<u></u>
<b>Unit of Assignment</b>	<u>OFFICE OF INSPECTOR GENERAL</u>				
<b>Work Address</b>	<u>561 BRADFORD ST. PASADENA CA 91105</u>				
<b>Immediate Supervisor</b>	<u>JEFFREY LEVINSON</u>				

**Date & Time Form Completed:** 03/09/2022 07:57 AM

**Did the complainant notify a supervisor/manager of this complaint prior to now?**

☐

Yes (if yes, fill in details):

Name of Supervisor Notified:

Date: NOT AVAILABLE

How:

☐

No

☐

Do not know

**Section B: Complainant(s) Information**

<b>Name</b>	<u>MAX HUNTSMAN</u>	<b>Emp #</b>	<u>e410745</u>	<b>Title</b>	<u>INSPECTOR GENERAL (UC)</u>
<b>Work #</b>	<u>[REDACTED]</u>	<b>Mobile #</b>	<u></u>	<b>Work Hrs</b>	<u></u>
				<b>RDO</b>	<u></u>
<b>Department</b>	<u>BOARD OF SUPERVISORS</u>	<b>Dept Head</b>	<u>Celia Zavala</u>		
<b>Unit of Assignment</b>	<u>OFFICE OF INSPECTOR GENERAL</u>				
<b>Work Location</b>	<u>OFFICE OF INSPECTOR GENERAL</u>				
<b>Immediate Supervisor</b>	<u>JEFFREY LEVINSON</u>				

---

**Section C: Alleged Involved Party(ies) Information**

<b>Name</b>	<u>ALEJANDRO VILLANUEVA</u>	<b>Emp #</b>	<u>e246296</u>	<b>Title</b>	<u>SHERIFF/UNCLASSIFIED</u>
<b>Work #</b>	<u>(562) 694-2400</u>	<b>Mobile #</b>	<u></u>	<b>Work Hrs</b>	<u></u>
				<b>RDO</b>	<u></u>
<b>Department</b>	<u>OTHER - Sheriff</u>	<b>Dept Head</b>	<u></u>		
<b>Unit of Assignment</b>	<u>OFFICE OF THE SHERIFF</u>				
<b>Work Location</b>	<u>HALL OF JUSTICE</u>				
<b>Immediate Supervisor</b>	<u></u>				

**Section D: Alleged Witness(es) Information (if they can be identified)**

**Section E: Nature of Complaint or Issue(s)**

1. What is the date of the alleged potential violation(s)? March 8, 2022

2. Please provide a detailed summary of the alleged potential violation(s):

As reported by RP/CP Huntsman: "...T[]he Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack." RP/CP writes, " My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as foreign (German or Jewish)."

3. Why does the Complainant(s) believe the treatment occurred/is occurring?:

Race



**Section F: TO BE COMPLETED BY SUPERVISORS/MANAGERS ONLY**

Date & time supervisor/manager observed and/or was notified of the alleged potential violation(s):

n/a

How was supervisor/manager made aware of the alleged potential violation(s)? (Explain in detail):

What action(s), if any, did the supervisor/manager take? (Explain in detail):

Did the supervisor/manager ascertain whether Complainant(s) is/are in need of any of the following? (If so, please explain in space provided):

Medical Attention: \_\_\_\_\_

Protection: \_\_\_\_\_

Separation from Alleged Involved Party  
(ies): \_\_\_\_\_

Other Assistance: \_\_\_\_\_

Did the supervisor/manager advise the Complainant(s) that they:

May seek confidential counseling or assistance from County's Employee Assistance Program (EAP) at (213) 738-4200.

May contact the County Intake Specialist Unit (CISU) directly at (855) 999-2367, or via email at [ceop@bos.lacounty.gov](mailto:ceop@bos.lacounty.gov)

**COMPLAINT SUBMISSION**

By submitting this complaint I am declaring, under penalty of perjury under the laws of the State of California, that:

- The facts set forth herein are true and correct and based on my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe to be true;
- I believe that the facts alleged herein are jurisdictional to the County Policy of Equity (accessible at: <https://ceop.bos.lacounty.gov>), are not duplicative of facts set forth in previously filed County Policy of Equity complaints that I have filed, and
- The filing of this County Policy of Equity complaint is not a misuse or abuse of the County's Policy of Equity Complaint Process.

MAX HUNTSMAN

Printed Name

\_\_\_\_\_  
Signature

March 9, 2022

Date

**OPTIONAL: Please provide the information below for statistical purposes only**

**Race/Ethnicity:**

*"The employer is subject to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, the employer invites employees to voluntarily self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that required the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual." - (eeoc.gov)*

☐ Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

☒ White (Not Hispanic or Latino) - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

☐ Black or African-American (Not Hispanic or Latino) A person having origins in any of the black racial groups of Africa.

☐ Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino) - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

☐ Asian (Not Hispanic or Latino) - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

☐ American Indian or Alaska Native (Not Hispanic or Latino) - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

☐ Two or More Races (Not Hispanic or Latino) - All persons who identify with more than one of the above five races.

**Gender:**

☒ Male

☐ Female

☐ Prefer Not to Answer

**Date of Birth:** 01/17/1965

# EXHIBIT B

**For I.S.U. Use Only**

Method of Receipt

- ☐ Telephone  
☐ In Person  
☐ POE Report Form  
☒ Other: CPOE  
Intake # 22-045

**Policy of Equality**  
**Report / Notification Form**

**General Instructions:** Use this form to report a potential violation of the Policy of Equality. Non-supervisors may also report a potential violation of the Policy of Equality by calling the Intake Specialist Unit at (323) 890-5371 or visiting them at 4900 S. Eastern Avenue, Suite 203, Commerce.

**Section A:** Reporting Party Information

Today's Date: 03 / 17 / 2022

Name: Huntsman, Max Emp. #: 410745 Rank/Title Inspector General  
Work Tel# [REDACTED] ; Home Tel#                      ; Work Hours            -            RDO             
Unit of Assignment: Office of Inspector General Unit Commander: Jeffrey Levinson  
Division LA County Board of Supervisors  
Name of Supervisor Completing this form (if different from above): B-1 Deputy Jonathan Lested # 467422  
Date & Time form completed: 03 / 17 / 2022 1200 hours.

- ☐ Anonymous (Do not provide identifying information above if anonymous. You must, however, fill out the rest of the form. **Do not check if you are a reporting supervisor.**)

Did the complainant and/or alleged victim notify a supervisor of this complaint prior to now?

- ☐ Yes (if yes, fill in details)

Who:                                     

When: Date:            /            /            Time:            hours.

How                                     

- ☐ No

- ☒ Do not know

**Section B:** Date And Time of Potential Violation

Day, Date and time alleged violation / alleged incident occurred: 03 / 08 / 2022            hours or  
between            /            /            and            /            /           

If multiple incidents or unknown, explain:  
See narrative.

**Section C:** Alleged Complainant(s) (if not the same as the Reporting Party and if they can be identified)

Same as RP                      Employee #            Rank/Title                      UOA                       
Work Tel#                      ; Home Tel#                      ; Work Hours            -            RDO             
                     Employee #            Rank/Title                      UOA                       
Work Tel#                      ; Home Tel#                      ; Work Hours            -            RDO             
                     Employee #            Rank/Title                      UOA                       
Work Tel#                      ; Home Tel#                      ; Work Hours            -            RDO

\*\*\*\*\*

Section D: Alleged Involved Party(ies) (if they can be identified)

Villanueva, Alejandro (Sheriff) Employee # 246296 UOA Office of Sheriff  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ UOA \_\_\_\_\_

\*\*\*\*\*

Section E: Alleged Witness(es) (if they can be identified)

None Stated Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_  
\_\_\_\_ Employee # \_\_\_\_\_ Rank/Title \_\_\_\_\_ UOA \_\_\_\_\_  
Work Tel# \_\_\_\_\_ ; Home Tel# \_\_\_\_\_ ; Work Hours \_\_\_\_\_ - \_\_\_\_\_ RDO \_\_\_\_\_

\*\*\*\*\*

Section F: Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

On March 16, 2022, the ISU received a County Policy of Equity report (ICMS #2022-112213) from CEOP Executive Director Vickey Bane, filed by RP/CP Max Huntsman on March 9, 2022. The narrative of the complaint stated, in part, the following (verbatim): "...The Sheriff sent an email throughout the Sheriff's Department that was a racially biased attack."

"My birth name was Max-Gustaf Edler. My father did not participate in raising me and so I took my mother's family name Huntsman as a law student with the help of a firm I clerked for. As Inspector General I have never used any name other than Max Huntsman, which is also my name on my driver's license and passport. A county computer system continues to incorrectly list my first name as Max-Gustaf and the sheriff has repeatedly referred to me as Max-Gustaf in public attacks. I believe this is dog whistling to the extremists he caters to as the more unusual name might lead some to view me as

Ask: "Why do you believe this treatment is occurring?"

(☒ Check, if narrative is continued onto the next page)

Race \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



Section F (cont'd): Nature of the Complaint or Issue(s) -- Be as detailed as possible, include all incidents & evidence.

foreign (German or Jewish)."

(ISU Note: For details, refer to copy of CPOE complaint contained in ISU efile.)

\*\*\*\*\*

**Note: Continue onto the next page**

Section G: Supervisor -- FOR NON-VICTIM SUPERVISORY USE ONLY. DO NOT FILL OUT THIS SECTION IF YOU ARE THE ALLEGED VICTIM OR A NON-SUPERVISOR.

Date & Time notified of potential violation / observation was made: 03 / 16 / 2022 , 1521 hours.

How did you become aware of the potential violation (explain in detail):  
The ISU received CPOE ICMS #2022-112213, containing the above allegations.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Supervisor's Actions (if any) (explain in detail)

A POE Report was generated by ISU Deputy Jonathan Lested to document the allegation in the County Policy of Equity

Complaint.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Did you ascertain whether complainant(s) and/or victim(s) are in need of:

- ☒ Medical Attention  
**Response:** to be ascertained  
☒ Protection  
**Response:** to be ascertained  
☒ Other Assistance  
**Response:** to be ascertained

Advised the complainant(s) and/or victim(s) that they:

- ☒ May seek confidential counseling or assistance from Employee Support Services

Notifications:

☐ **Intake Specialist Unit phone notification:** (During business hours, direct telephone (323) 890-5371. After hours, request through Sheriff's Headquarter's Bureau (323) 526-5541)

Intake Specialist notified via telephone: \_\_\_\_\_ Date & Time: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_, \_\_\_\_\_ hour.  
(Name)

☒ **POE Report/Notification Form forwarded to Intake Specialist Unit**

Date & Time: 03 / 16 / 2022 , 1521 hour. How?: ☒ e-mail ☐ Fax ☐ County mail

\*\*\*\*\*

Section H: **For Intake Specialist Unit Use Only** - DO NOT FILL OUT IF YOU ARE REPORTING A POTENTIAL VIOLATION TO THE INTAKE SPECIALIST UNIT.

Intake Specialist Name: B-1 Deputy Jonathan A. Lested Emp. #: 467422

Day, Date and time ISU received form Thursday / 03 / 17 / 2022 , 1215 hours.

☐ Referred to Equity Unit: Date & Time - \_\_\_\_ / \_\_\_\_ / \_\_\_\_ , \_\_\_\_ hours.

☒ If not referred to Equity Unit, explain in detail action taken:

"B" assessment authored by DCO Sieberg received on 04/07/2022.

\_\_\_\_\_  
\_\_\_\_\_

Additional Information (if any): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

- ☐ Check here if this violation has already been reported. If so, this form should be attached to the already existing report as an addendum. If the existing report has already been forwarded to the Equity Unit or any other Department entity, this form should be forwarded as well.

CC:

- ☒ Equity Oversight Panel  
☐ Subject's Unit Commander  
☐ Reporting Party's Unit Commander  
☐ Victim's Unit Commander

# EXHIBIT C



**IV 2558097  
EXHIBIT C**



# MISCELLANEOUS DOCUMENTS



SH-AD-703 Revised (2/22)

COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
*"A Tradition of Service Since 1850"*

DATE: June 27, 2022

FILE NO:

OFFICE CORRESPONDENCE

**FROM:** JASON P. WOLAK, COMMANDER  
PROFESSIONAL STANDARDS DIV.

**TO:** RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU

**SUBJECT: REQUEST FOR** INTERNAL AFFAIRS BUREAU ADMINISTRATIVE INVESTIGATION

Incident Date(s): (use semi-colons to separate multiple dates)

Between March 5, 2022, and March 22, 2022

**Synopsis:**

POE 22-045. It is alleged that Subject Villanueva acted in an inappropriate POE related manner while in the workplace.

Date a Sergeant, or above, became aware of an act, omission, or other misconduct:  
March 16, 2022

One Year Statute Date (If criminal monitor, leave blank): March 15, 2023

Alcohol Related? NO

Citizen Complaint? NO

If yes, SCR #:

Complainant's Name (Add employee number if a Department member)

Max Huntsman, Office of Inspector General, #410745

**REQUEST FOR IAB INVESTIGATION AND/OR CRIMINAL MONITOR**

**Involved Subject** (For additional subjects, use Subject Continuation Page 703-A)

**Subject Name, Rank, Employee Number, and Unit of Assignment:**

Alex Villanueva, Sheriff, #246296, Office of the Sheriff

**Potential MPP Violation(s):**

3-01/121.10 - POE Discrimination; 3-01/121.20 - POE Harassment Other than Sexual;  
3-01/121.25 POE Third Party Harassment;  
3-01/121.30 POE Inappropriate Conduct Toward Others

**Subject's Assignment/Duty Status:**

- ☒ Subject's assignment/duty status unchanged  
☐ Relieved of Duty (ROD), assigned to home ROD Date:  
☐ ROD, assigned to a relieved of duty position  
☐ Probationary Employee

**Justification for the subject's assignment/duty status (required):**

N/A

**Consideration(s) for IAB Request:**

\* Mandatory IAB Investigation

- ☐ Witnesses are spread over a large geographic area.  
☐ The nature of the allegation(s) involves incidents of high media attention.  
☐ A subject is a supervisor or manager (lieutenant or above; assistant director or above).  
☐ The nature of the allegation(s), if founded, will likely result in discharge.\*  
☐ The allegation(s) concern family/domestic violence.  
☐ The allegation(s) concern workplace violence.\*  
☐ The allegation(s) concern profiling or bias against members of the public.\*  
☒ Other: Allegations contain Policy of Equality\*

- ☐ Criminal Monitor by IAB (Refer to MPP 3-04/020.30 – Internal Administrative and Criminal Investigations) *enter investigating agency, crime, and report number.*

Supervisory Inquiry authored? ☐ Yes ☒ No

Contact person for source documents (i.e.: supervisory inquiry and/or investigative materials) at the requesting unit:

Prepared by Unit Commander/Director, or designee:

Lieutenant John Carter, #435532, Internal Affairs Bureau

**NOTE:** Email this form to "IAB Investigation Requests." A review of this request will be conducted by the Internal Affairs Bureau. There may be situations when the Internal Affairs Bureau will decide, upon initial review, to return the case to be conducted as a unit level investigation.

**For IAB use only**

Assigning Lieutenant Lieutenant John Carter, #435532

IAB Investigator Christine Diaz-Herrera, Esquire, Sanders Roberts LLP



COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**  
"A Tradition of Service Since 1850"

DATE: June 27, 2022

IV NO: 2558097

OFFICE CORRESPONDENCE

FROM:

EDWIN A. ALVAREZ, CHIEF  
PROFESSIONAL STANDARDS DIVISION

TO:

RON KOPPERUD, CAPTAIN  
INTERNAL AFFAIRS BUREAU**SUBJECT: SUBJECT OF ADMINISTRATIVE INVESTIGATION NOTIFICATION**

SUBJECT EMPLOYEE NAME, RANK, AND EMPLOYEE NUMBER:

Alex Villanueva, Sheriff, #246296

Department Knowledge Date (The date a sergeant, or above, became aware of an act, omission, or other misconduct):

03/16/2022

Potential MPP Violation(s) including, but not limited to:

3-01/121.10 POE - DISCRIMINATION  
3-01/121.20 POE - DISCRIMINATORY HARASSMENT (OTHER THAN SEXUAL)  
3-01/121.25 POE - THIRD PERSON HARASSMENT  
3-01/121.35 POE - RETALIATION

Nature of the investigation (general description):

It is alleged you acted in an inappropriate POE related manner and in the workplace.

You are advised that the authorization given by your Unit Commander to other supervisors to approve your routine absence requests has been rescinded. You are being ordered by your Unit Commander that during the time this investigation is active, any routine absence request must be submitted directly to him/her, and approval or denial of the request must come directly from them as well. You are additionally reminded of your responsibilities in submitting absence requests under **MPP 3-02/030.05 - ROUTINE ABSENCES**.

**SUBJECT EMPLOYEE ACKNOWLEDGEMENT OF NOTIFICATION:**

Subject:

Employee #:

246296

Date:

6/29/22

Witness:

Employee #:

410429

Date:

6/29/22



Manual of Policy and Procedures : 3-01/121.10 - Policy of Equality - Discrimination

---

### **3-01/121.10 - Policy of Equality - Discrimination**

Discrimination is the disparate or adverse treatment of an individual based on or because of that individual's:

- Age (40 and over);
- Ancestry;
- Color;
- Denial of family and medical care leave;
- Disability (physical and mental, including HIV and AIDS);
- Ethnicity;
- Gender identity/gender expression;
- Genetic information;
- Marital status;
- Medical condition (genetic characteristics, cancer, or a record or history of cancer);
- Military or veteran status;
- National origin (including language use restrictions);
- Race;
- Religion (includes religious dress and grooming practices);
- Sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions);
- Sexual orientation; and
- Any other characteristic protected by state or federal law.

**Revised: 11/20/2020**

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Manual of Policy and Procedures : 3-01/121.20 - Policy of Equality - Harassment (Other  
Than Sexual)

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### **3-01/121.20 - Policy of Equality - Harassment (Other Than Sexual)**

Harassment of an individual based on or because of the individual's protected characteristic is also discrimination and prohibited. Harassment is conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, offensive, or abusive work environment, and a reasonable person subjected to the conduct would find that the harassment so altered working conditions as to make it more difficult to do the job.

**Revised: 11/20/2020**

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Manual of Policy and Procedures : 3-01/121.25 - Policy of Equality - Third-Person  
Harassment

---

### **3-01/121.25 - Policy of Equality - Third-Person Harassment**

Third person harassment is indirect harassment of a bystander, even if the person engaging in the conduct is unaware of the presence of the bystander. When an individual engages in potentially harassing behavior, they assumes the risk that someone may pass by or otherwise witness the behavior. The Department considers this to be the same as directing the harassment toward that individual.

**Revised: 11/20/2020**

---



Manual of Policy and Procedures : 3-01/121.30 - Policy of Equality - Inappropriate  
Conduct Toward Others

---

### **3-01/121.30 - Policy of Equality - Inappropriate Conduct Toward Others**

Inappropriate conduct toward others is any physical, verbal, or visual conduct based on or because of any of the protected characteristics described in this policy, when such conduct reasonably would be considered inappropriate for the workplace.

This provision is intended to stop inappropriate conduct based on a protected characteristic before it becomes discrimination, sexual harassment, retaliation, or harassment under this policy. As such, the conduct need not meet legally actionable state and/or federal standards to violate this policy. An isolated derogatory comment, joke, racial slur, sexual innuendo, etc., may constitute conduct that violates this policy and be grounds for discipline. Similarly, the conduct need not be unwelcome to the party against whom it is directed; if the conduct reasonably would be considered inappropriate by the Department for the workplace, it will violate this policy.

**Revised: 11/20/2020**

---





# EXHIBIT 19

# INVESTIGATOR'S LOG

<b>FILE NUMBER:</b>		IV 2558097
<b>INVESTIGATOR:</b>		Sanders Roberts LLP
<b>DATE DEPARTMENT BECAME AWARE OF ALLEGATION(S):</b>		03/16/2022
<b>DATE IAB INVESTIGATION INITIATED:</b>		06/27/2023
<b>DATE SENT TO ADVOCACY UNIT:</b>		
<b>DATE RETURNED FROM ADVOCACY UNIT:</b>		
<b>DATE FORWARDED TO FORCE OR RISK REVIEW:</b>		
<b>DATE RETURNED FROM FORCE OR RISK REVIEW:</b>		
<b>DATE TO DIVISION:</b>		
<b>DATE RETURNED TO IAB:</b>		
<b>CASE SUMMARY:</b>		
<b>DATE</b>	<b>SUMMARY</b>	<b>NAME</b>
06/22/22	Attorney Client Privilege	Lt. Carter
06/23/22	Attorney Client Privilege	Lt. Carter
06/24/22	Commander Wolak called and informed me to handle this matter in the same fashion as the previous involved Sheriff cases.	Lt. Carter
07/07/2022	Per Ms. Real, hard case delivered to Ms. Diaz Herrera's office	Lt. Carter
08/03/22	Emailed Ms. Diaz Herrera for an update.	Lt. Carter
10/03/22	Sent email to Ms. Diaz Herrera re: case status.	Lt. Carter
10/13/22	All interviews have been completed, except for the Sheriff. Will attempt to schedule a date by 10/14/22.	Lt. Carter
11/02/22	Sent email to Ms. Diaz Herrera re: case status.	Lt. Carter
11/07/22	Re-inquired about case status.	Lt. Carter
11/14/22	Completed all the interviews necessary for the Huntsman matter, with exception of Sheriff Villanueva. She has reached out to Commander Satterfield to sched Sheriff Villanueva's interview. She does not have a date sched for the interview yet.	Lt. Carter
11/30/22	I sent Commander Satterfield and Capt. Blanchard an email	Lt. Carter



# INVESTIGATOR'S LOG

	asking them to contact the attorney in order to set up an interview with Sheriff Villanueva.	
11/30/22	Commander Satterfield and Capt Blanchard called and informed me that they never received any requests for interviews for Sheriff Villanueva.	Lt. Carter
12/13/22	Sent email to Ms. Diaz Herrera regarding update.	Lt. Carter
01/04/23	Certified letter sent requesting an interview with the subject, Villanueva.	Lt. Carter
01/09/23	Former Sheriff Villanueva contacted the attorney.	Lt. Carter
01/12/23	Attorney Client Privilege	Lt. Carter
02/02/23	Sent an email requesting a case status.	Lt. Carter
02/21/23	Sent another email, no response.	Lt. Carter
03/05/23	Sent a 3 <sup>rd</sup> email requesting an update.	Lt. Carter
03/09/23	Ms. Diaz Herrera responded. Villanueva is not cooperating. Attorney Client Privilege	Lt. Carter
03/09/23	Briefed Chief Lecrivain and are moving forward with the case.	Lt. Carter
04/03/23	Per Ms. Diaz-Herrera, she advised Shawn Thomas was reassigned all 4 cases.	Lt. Carter
04/18/23	Sent email to new council Shawn Thomas regarding an update.	Lt. Carter
04/19/23	Received update- Outside counsel have undertaken to draft a final report using interview and relevant evidence.	Lt. Carter
05/15/23	Attorney Shawn Thomas sent an email stating he would send the Hunstman case back to IAB this week.	Lt. Carter
06/14/23	Emailed Mr. Thomas regarding 4 POE cases. 2 cases (Huntsman, Lim) are ready for pick up. IAB LET and Risk Management LET not available until next Tuesday (6/27/23).	Lt. Carter
07/05/23	Lt. Ann Devane took over the POE team, Lt. John Carter explained the process of reviewing, completing and stacking the case.	Lt. Devane
08/16/23	Reviewed zoom interview with Complainant Huntsman	Lt. Devane
08/24/23	Converted zoom interview to wave file to send out and have the interview transcribed	Lt. Devane
08/28/23	Received transcripts	Lt. Devane

## INVESTIGATOR'S LOG

09/12/23	Worked on completing required documents to stack the case	Lt. Devane
09/21/23	Reviewed transcripts and compared to the summary written by Saunders Roberts LLP, and confirmed the statements made by Complainant Huntsman were all documented in the summary.	Lt. Devane
09/26/23	Requested Subject Villanueva's training record and copy of Policy of Equality notification form, unable to locate either, per IAB Secretary V.	Lt. Devane
09/26/23	Stacked case and submitted to IAB Captain Kopperud for review.	Lt. Devane
10-2-23	Reviewed - approved	R Kopperud

# EXHIBIT 20



SH-AD-32A (3/23)


COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

*"A Tradition of Service Since 1850"*

DATE: October 17, 2023

FILE NO: IV 2558101

OFFICE CORRESPONDENCE

**FROM:**   
SERGIO V. ESCOBEDO  
ACTING COMMANDER  
PROFESSIONAL STANDARDS  
DIVISION

**TO:** COUNTY EQUITY  
OVERSIGHT PANEL

**SUBJECT: POSSIBLE MANUAL OF POLICY AND PROCEDURES VIOLATIONS**

The following Manual of Policy and Procedures violations relate to the allegations in this case, regarding **Alex Villanueva, Former Sheriff:**

**3-01/121.10 Policy of Equality – Discrimination (Based on Gender and Ethnicity)**

Disposition:

- ☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.15 Policy of Equality – Sexual Harassment**

Disposition:

- ☐ Charge founded  
☐ Charge unresolved  
☒ Charge unfounded  
☐ Charge exonerated

**3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on Gender and Ethnicity)**

Disposition:

- ☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

-2-

September 19, 2023

**3-01/121.25 Policy of Equality – Third Person Harassment (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.35 Policy of Equality – Retaliation (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**Discipline Assessment – Alex Villanueva, [REDACTED]**

**Review of Applicable “Guidelines for Discipline” Section:**

The Departmental “Guidelines for Discipline” (revised August 1, 2020) includes the Policy of Equality, and lists the following analogous misconduct with the associated disciplinary penalties:

CONDUCT	STANDARD DISCIPLINE
3-01/121.10 Policy of Equality – Discrimination (Based on Gender and Ethnicity)	Five (5) Days to Discharge

-3-

September 19, 2023

<b>3-01/121.15 Policy of Equality – Sexual Harassment</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on Gender and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.25 Policy of Equality – Third Person Harassment (Based on Gender and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on National Origin and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.35 Policy of Equality – Retaliation (Based on Gender and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>

**Determination of Discipline:**

Based upon the attached assessment of mitigating and aggravating factors, the following discipline has been determined to be appropriate. This discipline is subject to revision upon receipt of the Subject's response or grievance.

- ☐ Discharge
- ☐ Reduction in Rank
- ☐ Removal from Bonus Position
- ☐ Suspension with loss of pay and benefits for \_\_\_ days with / without the option of EBD
- ☐ Written Reprimand
- ☐ No Discipline
- ☒ **X Panel Recommends "Do Not Rehire" notation at top of file**

SVE:WB:wb

# EXHIBIT 21

SH-AD-32A (3/23)


COUNTY OF LOS ANGELES  
**SHERIFF'S DEPARTMENT**

*"A Tradition of Service Since 1850"*

DATE: October 17, 2023

FILE NO: IV 2558101

OFFICE CORRESPONDENCE

**FROM:**   
SERGIO V. ESCOBEDO  
ACTING COMMANDER  
PROFESSIONAL STANDARDS  
DIVISION

**TO:** COUNTY EQUITY  
OVERSIGHT PANEL

**SUBJECT: POSSIBLE MANUAL OF POLICY AND PROCEDURES VIOLATIONS**

The following Manual of Policy and Procedures violations relate to the allegations in this case, regarding **Alex Villanueva, Former Sheriff:**

**3-01/121.10 Policy of Equality – Discrimination (Based on Gender and Ethnicity)**

Disposition:

- ☒ Charge founded
- ☐ Charge unresolved
- ☐ Charge unfounded
- ☐ Charge exonerated

**3-01/121.15 Policy of Equality – Sexual Harassment**

Disposition:

- ☐ Charge founded
- ☐ Charge unresolved
- ☒ Charge unfounded
- ☐ Charge exonerated

**3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on Gender and Ethnicity)**

Disposition:

- ☒ Charge founded
- ☐ Charge unresolved
- ☐ Charge unfounded
- ☐ Charge exonerated

-2-

September 19, 2023

**3-01/121.25 Policy of Equality – Third Person Harassment (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**3-01/121.35 Policy of Equality – Retaliation (Based on Gender and Ethnicity)**

Disposition:

☒ Charge founded  
☐ Charge unresolved  
☐ Charge unfounded  
☐ Charge exonerated

**Discipline Assessment – Alex Villanueva, [REDACTED]**

**Review of Applicable “Guidelines for Discipline” Section:**

The Departmental “Guidelines for Discipline” (revised August 1, 2020) includes the Policy of Equality, and lists the following analogous misconduct with the associated disciplinary penalties:

CONDUCT	STANDARD DISCIPLINE
3-01/121.10 Policy of Equality – Discrimination (Based on Gender and Ethnicity)	Five (5) Days to Discharge

-3-

September 19, 2023

<b>3-01/121.15 Policy of Equality – Sexual Harassment</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.20 Policy of Equality – Discriminatory Harassment (Based on Gender and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>
<b>3-01/121.25 Policy of Equality – Third Person Harassment (Based on Gender and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.30 Policy of Equality – Inappropriate Conduct Toward Others (Based on National Origin and Ethnicity)</b>	<b>Written Reprimand to Discharge</b>
<b>3-01/121.35 Policy of Equality – Retaliation (Based on Gender and Ethnicity)</b>	<b>Five (5) Days to Discharge</b>

**Determination of Discipline:**

Based upon the attached assessment of mitigating and aggravating factors, the following discipline has been determined to be appropriate. This discipline is subject to revision upon receipt of the Subject's response or grievance.

- ☐ Discharge
- ☐ Reduction in Rank
- ☐ Removal from Bonus Position
- ☐ Suspension with loss of pay and benefits for \_\_\_ days with / without the option of EBD
- ☐ Written Reprimand
- ☐ No Discipline
- ☒ **X Panel Recommends "Do Not Rehire" notation at top of file**

SVE:WB:wb



# EXHIBIT 22

3:13



Lim



Dec 22, 2023 at 4:57 PM

Hi max

Coco told me that lat did a pra request for our cpoe complaint.

They confirmed the dispo for mine. Told them I never got it. Reason was that LASD sent it to jails not Solis office.

I don't know that LASD or CPOE ever told me about it. I find out through my staff monitoring.

Yours may have gotten lost like mine. Coco sent mine today when I asked for it. The dispo letter was dated late October of this year.

I might have gotten it.



iMessage



3:14



Lm



late October of this year.

I might have gotten it.  
Since I already knew I  
wouldn't have paid much  
attention. I was more  
interested in the law that  
says it goes to POST and  
isn't protected.

Yes that part. Even w info  
redacted I think the lat  
already knows who is who.



Easy to figure out.

Jan 31, 2024 at 5:52 PM



'Do Not Rehire': Panel finds  
villain violated country



iMessage

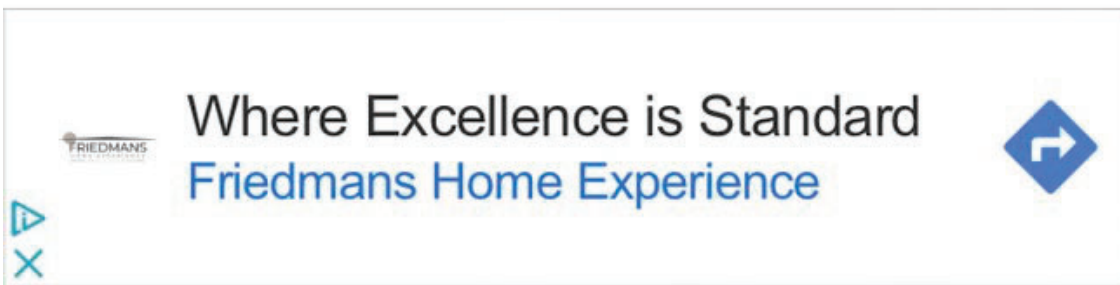


# EXHIBIT 23



MAX-GUSTAF HUNTSMAN

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MAX-GUSTAF HUNTSMAN

# MAX-GUSTAF HUNTSMAN

INSPECTOR GENERAL (UC) (2015)

Regular pay:

[REDACTED]

Overtime pay:

[REDACTED]

Other pay:

[REDACTED]

Total pay:

[REDACTED]

Benefits:

[REDACTED]





## California Top Lawyers

# Max-Gustaf Huntsman

Attorney

### Profile

#### **Status\***

#### **Active**

This member is active and may practice law in California.

#### **Firm / org**

[L.A. County Office of Inspector General](#)

#### **County**

Los Angeles

#### **District**

District 2

#### **Bar number**

156780

calsalaries.com



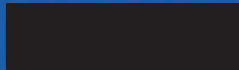
CalSalaries



# MAX-GUSTAF HUNTSMAN

(2012)

Deputy District Attorney  
Los Angeles County



## MAX-GUSTAF HUNTSMAN Salary Overview

As Deputy District Attorney at Los Angeles County, MAX-GUSTAF HUNTSMAN made [REDACTED] in total compensation. Of this total [REDACTED] was received as a salary, [REDACTED] was received as benefits and [REDACTED] came from other types of compensation . This information is according to Los Angeles County payrolls for the 2012 fiscal year.

MAX-GUSTAF HUNTSMAN total

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**Max-Gustaf Huntsman**

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# EXHIBIT 24



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

**ALEX VILLANUEVA vs COUNTY OF LOS ANGELES**

**ANN DEVANE**

**March 06, 2025**

**Vesna Walter, CSR No. 11989, Job No. 6895**

1

2

## UNITED STATES DISTRICT COURT

3

## CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

4

5 ALEX VILLANUEVA,

)

)

6

Plaintiff,

)

)

7

vs.

)

Case No.

)

2:24-cv-04979 SVW

8

COUNTY OF LOS ANGELES, COUNTY  
OF LOS ANGELES SHERIFF'S

)

)

9

DEPARTMENT, LOS ANGELES COUNTY  
BOARD OF SUPERVISORS, COUNTY

)

)

10

EQUITY OVERSIGHT PANEL, LOS  
ANGELES COUNTY OFFICE OF

)

)

11

INSPECTOR GENERAL, CONSTANCE  
KOMOROSKI, MERCEDES CRUZ,

)

)

12

ROBERTA YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON

)

)

13

KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN, ESTHER

)

)

14

LIM, and DOES 1 to 100,  
inclusive,

)

)

15

)

Defendants.

)

16

)

17

18

19

REMOTE DEPOSITION OF

20

ANN DEVANE

21

Thursday, March 6, 2025

22

23

Stenographically Reported By:

24

Vesna Walter, CSR, RPR, CCRR

CSR No. 11989

Job No. 6895

25



1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3  
4 ALEX VILLANUEVA, )  
5 )  
6 Plaintiff, )  
7 )  
8 vs. ) Case No.  
9 ) 2:24-cv-04979 SVW  
10 ) (JCx)  
11 COUNTY OF LOS ANGELES, COUNTY )  
12 OF LOS ANGELES SHERIFF'S )  
13 DEPARTMENT, LOS ANGELES COUNTY )  
14 BOARD OF SUPERVISORS, COUNTY )  
15 EQUITY OVERSIGHT PANEL, LOS )  
16 ANGELES COUNTY OFFICE OF )  
17 INSPECTOR GENERAL, CONSTANCE )  
18 KOMOROSKI, MERCEDES CRUZ, )  
19 ROBERTA YANG, LAURA LECRIVAIN, )  
20 SERGIO V. ESCOBEDO, RON )  
21 KOPPERUD, ROBERT G. LUNA, )  
22 MAX-GUSTAF HUNTSMAN, ESTHER )  
23 LIM, and DOES 1 to 100, )  
24 inclusive, )  
25 Defendants. )  
\_\_\_\_\_ )

15

16

17

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19

20

21 Deposition of ANN DEVANE, taken on behalf of  
22 Plaintiff, with all parties appearing remotely, beginning  
23 at 10:05 a.m. and ending at 3:24 p.m. Pacific time, on  
24 Thursday, March 6, 2025, before VESNA WALTER, Certified  
25 Shorthand Reporter No. 11989.

1 APPEARANCES (All parties appearing remotely)

2

For the Plaintiff:

3

SHEGERIAN & ASSOCIATES, INC.

4

By: ALEX DiBONA

NEIL NABAVI

5

Attorneys at Law

11520 San Vicente Boulevard

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For the Defendants:

9

MILLER BARONDESS, LLP

By: JASON H. TOKORO

10

STEVEN WILLIAMSON

Attorneys at Law

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2121 Avenue of the Stars

Suite 2600

12

Los Angeles, California 90067

(310) 552-4400

13

Jtokoro@millerbarondess.com

14

ALSO PRESENT:

15

ALEX VILLANUEVA

16

17

18

19

20

21

22

23

24

25

## 1 I N D E X

2 WITNESS

3 ANN DEVANE

4 Examination by: Page

5 MR. DiBONA 6

6 MR. TOKORO 181

7

8

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16		143	2
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19			
20			
21			
22			
23			
24			
25			

1 conduct towards other employees.

2 Q And how did you get the assignment to be on  
3 the -- to be doing investigations on the -- related to  
4 the policy of equality? Excuse me.

5 A The lieutenant who was doing that prior to me  
6 transferred to another location. So when that position  
7 came open, I was put in that position.

8 Q And do you know who put you in that position?

9 A I believe that at the time that he was captain,  
10 Ron Kopperud -- and that's spelled K-o-p-p-e-r-u-d -- and  
11 Commander Sergio Escobedo and Chief Laura Lecrivain.

12 Q And did you have to interview to be on the  
13 policy of equality -- to be a policy-of-equality  
14 investigator or was that -- assignment was given to you?

15 A I did not have to interview.

16 Q What did you consider to be your primary job  
17 responsibility with respect to being a policy-of-equality  
18 investigator?

19 A I had to monitor a team of six sergeants who  
20 were the investigators, and I reviewed all of their cases  
21 once they completed them.

22 Q And were you reviewing the cases to ensure that  
23 they -- sorry. Let me ask it this way. As an internal  
24 affairs investigator focusing on policy-of-equality  
25 cases, are you familiar with any best practices in how to

1     conduct such investigation?

2           A     I don't understand your question.

3           Q     It's fair. I'll rephrase it.

4                     But do you understand what I mean by "best  
5     practices"?

6           A     Not in the respect of investigations.

7           Q     All right. Are there specific procedures that  
8     you believe should be followed in every investigation as  
9     an internal affairs investigator with policy of equality?

10          A     There are set procedures for the investigators,  
11     but it's not -- it's not, like, a handwritten document.

12          Q     And what are those set procedures?

13          A     To conduct their investigations, to do fair and  
14     impartial investigations, to document what was said  
15     during the investigations, to transcribe the interviews  
16     and put the casebook together in a specific order once  
17     the investigation is complete.

18          Q     Being fair and impartial, would that be another  
19     way of saying it's important the investigators be free of  
20     bias?

21          A     Yes.

22          Q     And when you say to document, does that mean the  
23     steps of the investigation should be written down or  
24     memorialized?

25          A     Yes.



1           Q     To transcribe the interviews, does that mean  
2     there needs to be a video or audio recording of the  
3     actual interviews they conduct themselves?

4           A     Yes. They are recorded audibly and then  
5     transcribed after the interviews are completed.

6           Q     And putting the casebook in a specific order,  
7     are you able to say what the order is?

8           A     Yes. There's -- there is a written guideline  
9     for that. It's -- there's a lot in it, actually.  
10    Obviously, the cover page, the table of contents, the  
11    personnel investigation form, the witness interviews and  
12    their transcripts, the summary, and then an audio/video  
13    page and then any miscellaneous documents that they need  
14    to add in there.

15          Q     And would you agree with me, as a general  
16    matter, internal affairs investigators on  
17    policy-of-equality cases, as a general matter, try to  
18    interview all relevant witnesses?

19          A     Yes.

20          Q     And would you agree with me that as a general  
21    matter, that internal affairs investigators in policy-of-  
22    equality cases -- if a witness gives them supporting  
23    evidence, they should try to seek out that supporting  
24    evidence?

25          A     I don't understand correctly. Are you talking

1 was from February 2016 until July of 2017.

2 Q And what does a lieutenant in court services do?

3 A I was an area lieutenant. So I was in charge of  
4 I believe it was eight different courts, and I would go  
5 to the courts. And I would also handle administrative  
6 paperwork similar to what I'm doing now if it was a  
7 use-of-force investigation or an employee injury. And  
8 then if there was any problems with any of the employees  
9 or the inmates who were going to court, I would handle  
10 those situations.

11 Q And prior to that, were you -- was that the  
12 first assignment you had when you were promoted to  
13 lieutenant?

14 A That's correct.

15 Q And at any point in your career within the  
16 sheriff's department, did you ever work with Alex  
17 Villanueva prior to him becoming the elected sheriff?

18 A Yes, I did.

19 Q And when was that, if you have an estimate of  
20 what years?

21 A There was a short time when I was assigned to  
22 CRDF, which is the Century Regional Detention Facility,  
23 and that was when I was a sergeant, and I believe that  
24 was in 2012, and it was only for maybe a six-month  
25 period. And then I transferred to Temple station. And

1 then when I was a lieutenant at Pico Rivera station in  
2 July of 2017 until he retired was when I worked with Alex  
3 Villanueva.

4 Q And so just to be clear, for CRDF in 2012, did  
5 you work with Alex Villanueva then?

6 A Yes. I was a sergeant and he was a lieutenant;  
7 so we did interact.

8 Q And did you have -- excuse me. Did you have any  
9 reporting relationship other than he was a higher rank?  
10 Were you a direct report of his?

11 A Yes. If he was my watch commander of my shift,  
12 then I would have to report to him during that shift.

13 Q And did you ever have any issues or concerns  
14 with Sheriff Alex Villanueva in 2012 when you reported to  
15 him?

16 A No.

17 Q In 2012, did Alex Villanueva ever say anything  
18 in the workplace that you found to be inappropriate or  
19 offensive?

20 A No.

21 Q Did you ever hear in 2012 Alex Villanueva make  
22 any comments that you felt was offensive related to  
23 someone's race?

24 A No.

25 Q And did you -- in 2012, did you ever hear Alex

1 Villanueva make a comment that you felt was offensive  
2 related to someone's gender?

3 A No.

4 Q In --

5 MR. TOKORO: I'm just going to interpose an  
6 objection to this line of questioning as it not being  
7 relevant to any claims or defenses in this case. But you  
8 can proceed, Alex.

9 BY MR. DiBONA:

10 Q In 2012, do you believe that Alex Villanueva, as  
11 your commander officer, treated you any differently  
12 because you're a woman?

13 A No.

14 Q And do you feel that Alex Villanueva ever  
15 treated you any differently based on your age in 2012?

16 A No.

17 Q What were your primary job duties at CRDF?

18 A I was a sergeant and I was assigned to booking  
19 front and reception, which is where the inmates first  
20 come into the jail and get processed into the jail.

21 Q And you -- excuse me. And how did it come --  
22 sorry.

23 At some point in time, you left CRDF; is that  
24 right?

25 A That's correct.

1     itself. If you're just asking her to say what's on  
2     there, she can answer.

3             THE WITNESS: Well, the date of June 22nd, 2022,  
4     is the first entry that Lieutenant Carter made, but that  
5     doesn't necessarily mean that that's the date that the  
6     investigation started.

7     BY MR. DiBONA:

8             Q     That was going to be my next question.

9             But my question now is: You see the date  
10    June -- 6/27/2023 under date IAB investigation initiated;  
11    correct?

12            MR. TOKORO: Objection. Vague and ambiguous. I  
13    may have misheard you, but I think you said June 6 27,  
14    2023.

15            THE WITNESS: I'm sorry.

16    BY MR. DiBONA:

17            Q     Just to avoid all the back-and-forth -- because  
18    what I thought I said was the number 6, as in the sixth  
19    month. But to avoid all of this -- we don't have to read  
20    anything back just so we have a clear record.

21            Do you see the date June 27th, 2023, as the date  
22    the IAB investigation was initiated on this document?

23            MR. TOKORO: Same objection. Document speaks  
24    for itself.

25            But you can answer.

1 THE WITNESS: Yes. I do see that date on that  
2 line, yes.

3 BY MR. DiBONA:

4 Q All right. And do you see on the case summary,  
5 the first entry in this document is June 22nd, 2022? Do  
6 you see that?

7 A Yes.

8 Q So can you explain to me how, if the first date  
9 on the entry is June 6 -- sorry -- June 22nd, 2022, how  
10 can the investigation have been initiated June 27th,  
11 2023 -- sorry -- June 27, 2023?

12 A I don't know, because this form was initiated by  
13 Lieutenant Carter prior to me taking over as the policy-  
14 of-equality team lieutenant.

15 Q Are you familiar with a statute called POBAR?

16 A Yes.

17 Q And correct me if I'm wrong. You're aware,  
18 working in IAB, that as a general matter, discipline has  
19 to be given within one year of the date of the incident;  
20 is that right?

21 MR. TOKORO: Objection. Calls for a legal  
22 conclusion. Also misstates the law, lacks foundation,  
23 calls for speculation.

24 You can answer if you know.

25 THE WITNESS: Well, your question was a little



1 Q I'm going to send Exhibit 14 on the screen.

2 Do you see Exhibit 14 on the screen?

3 A Yes.

4 (Exhibit 14 was marked for identification.)

5 BY MR. DiBONA:

6 Q Exhibit 14 is COLA 002432 to 2434.

7 And have you seen this document before?

8 A Yes.

9 Q And is this -- excuse me. Is this the  
10 investigator's log with respect to the complaint filed by  
11 Esther Lim against Sheriff Alex Villanueva?

12 A Yes.

13 Q And you also -- you see the date here,  
14 3/16/2022, is the date the department became aware of the  
15 allegations?

16 A Yes.

17 Q And do you know how it was the department became  
18 aware of the allegations on around March 16, 2022?

19 A No.

20 Q And you see the date of June 27, 2023, is the  
21 date the IAB investigation initiated?

22 A Yes. That's what's documented there.

23 Q And you also see the first date at the bottom  
24 here is June 22nd, 2022?

25 A Yes.

1 Q And I understand you didn't draft this part.

2 But do you have any explanation for why the first date is  
3 June 22nd, 2022, and the date the investigation is  
4 purportedly initiated is June 27, 2023?

5 MR. TOKORO: Lacks foundation.

6 THE WITNESS: No, I do not, because I did not  
7 initiate this form.

8 BY MR. DiBONA:

9 Q And just a similar question, just so the record  
10 is clear. The entries with Lieutenant Carter, it's your  
11 understanding Lieutenant Carter would have been the one  
12 wrote those entries; is that right?

13 A Yes.

14 Q And did you undertake any steps to ensure that  
15 Lieutenant Carter's entries on this log were accurate?

16 A No. I did not do any follow-up regarding what  
17 he stated and what he did.

18 Q And conversely, do you have any information that  
19 any of his entries are inaccurate?

20 A I have no information that they are inaccurate.

21 MR. DiBONA: And just for the record, Alex  
22 Villanueva has joined the deposition as well, obviously  
23 remotely, but we'll just mark that.

24 BY MR. DiBONA:

25 Q And, Lieutenant Devane, your first entry is

1 July 5th, 2023. Do you see that here?

2 A Yes. That's correct.

3 Q And did you -- and the second entry is  
4 August 17th, 2023. There's an entry, "reviewed Zoom  
5 interview with Complainant Lim."

6 You see that?

7 A Yes. That's right.

8 Q Did you take any steps with respect to the IAB  
9 investigation of Esther Lim's complaints against Alex  
10 Villanueva between July 5th, 2023, and August 17, 2023?

11 A I was not doing the investigation, but I did not  
12 do anything relating to the paperwork given to me by  
13 Sanders Roberts between those dates.

14 Q And had you done so, is it fair to say you would  
15 have documented it in the investigator's log?

16 A Yes. That's correct.

17 Q Do you see here on September 21, 2023, there's  
18 an entry "Reviewed transcripts and compared to the  
19 summary written by Sanders Roberts LLP and confirmed the  
20 statements made by Complainant Lim and witnesses were all  
21 documented in the summary"?

22 Did I read that correctly?

23 A Yes.

24 Q Have you -- does this refresh your recollection  
25 that you saw a transcript for the interview of Kyla

1 Coates?

2 A That does not recall my recollection. I don't  
3 recall if there were transcripts for an interview --

4 Q And --

5 A -- for Kyla Coates.

6 Q So when you write here that you confirmed the  
7 statements made by Complainant Lim and witnesses were all  
8 documented in the summary, just to break it down, how did  
9 you confirm the statements made by the witnesses were all  
10 documented in the summary?

11 A I don't -- I don't recall. That could have been  
12 a typo. But I don't recall if there were actual audible  
13 interviews that were transcribed for witnesses.

14 Q So just to be clear, you can't stand by the  
15 statement in this investigator's log that you confirmed  
16 the statements made by the witnesses were all documented  
17 in the summary?

18 MR. TOKORO: Objection. Argumentative,  
19 misstates her testimony, and is also misleading. You're  
20 not showing her the full stacked case file, which as you  
21 know, contains notes from both of those interviews.

22 You can answer the question if you understand  
23 it.

24 Also vague and ambiguous.

25 THE WITNESS: What I can state is I confirmed

1 what was written by -- if there was witnesses that were  
2 transcribed or if it was written in their summary, that  
3 what was -- I just confirmed what they had in their  
4 summary.

5 BY MR. DiBONA:

6 Q Just to be clear, when it says confirmed the  
7 statements made by just the witnesses were all documented  
8 in the summary, you are -- is your testimony you checked  
9 the summary against itself?

10 MR. TOKORO: Objection. Vague and ambiguous.  
11 Also misstates her testimony and, again, is misleading  
12 given you're not showing her the entire case file.

13 You can answer.

14 THE WITNESS: You know, I really -- I do not  
15 recall if what -- I compared witness testimony and  
16 summary -- I don't recall exactly what I meant in that  
17 written notation.

18 BY MR. DiBONA:

19 Q Would you agree with me that in order to confirm  
20 witness statements are accurate in a summary, you'd need  
21 to compare the summary to something?

22 MR. TOKORO: Objection. Vague and ambiguous  
23 and, again, misleading in that you're not showing her the  
24 entire stacked case file, which includes the notes from  
25 the interviews.

1 background, Lieutenant Devane, when you join the  
2 sheriff's department, do you take any type of oath?

3 A An oath of office?

4 Q Yes.

5 A Yes.

6 Q What does that oath of office, broadly speaking,  
7 entail? What are you taking an oath to do?

8 A My gosh, that was 24 years ago. I don't know  
9 the exact verbiage of what the oath is that -- when we're  
10 sworn in.

11 Q What is your understanding of what the oath  
12 requires you to do?

13 A To be -- to not -- I'm not -- I have no idea  
14 what the oath says.

15 Q Just to be clear, as a 24-year veteran of the  
16 department and as a lieutenant in the sheriff's  
17 department, you cannot recall anything about your oath of  
18 office as you sit here today?

19 MR. TOKORO: That's not the question you asked  
20 her and that's not the testimony that she gave, and it's  
21 also irrelevant and argumentative.

22 BY MR. DiBONA:

23 Q You may answer.

24 A I cannot recall the exact verbiage that's in the  
25 oath of office.



1 think we can conclude.

2 I'll reserve all rights with respect to any  
3 questions where there's an instruction not to answer, but  
4 yeah, we're concluded for today.

5 THE REPORTER: Mr. Tokoro, do you need a copy of  
6 the transcript?

7 MR. TOKORO: Yes. As I've been telling the  
8 other court reporters, the one that you're going to send  
9 for the witness, you can send that to our office, and  
10 we'll get that over to her to do her errata and sign it.  
11 And then we are -- our office will order one copy for our  
12 office.

13 (Deposition concluded at 3:24 p.m.)

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1                   DECLARATION UNDER PENALTY OF PERJURY

2                   I, ANN DEVANE, hereby certify under penalty of  
3   perjury under the laws of the State of California that  
4   the foregoing is true and correct.

5

6

7                   Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2025, at  
8   \_\_\_\_\_, \_\_\_\_\_.

9                   (City)

(State)

10

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12

\_\_\_\_\_  
ANN DEVANE

13

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1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:  
3 That the foregoing proceedings were taken before  
4 me at the time and date herein set forth; that any  
5 witnesses in the foregoing proceedings, prior to  
6 testifying, were duly sworn; that a record of the  
7 proceedings was made by me using machine shorthand, which  
8 was thereafter transcribed under my direction; that the  
9 foregoing transcript is a true record of the testimony  
10 given.

11 Further, that if the foregoing pertains to the  
12 original transcript of a deposition in a federal case,  
13 before completion of the proceedings, review of the  
14 transcript [XX] was [ ] was not requested.

15  
16 I further certify I am neither financially  
17 interested in the action nor a relative or employee of  
18 any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed  
20 my name.

21  
22 Dated: March 17, 2025

23

24 \_\_\_\_\_  
Vesna Walter  
RPR, CCRR, CSR No. 11989

25

# EXHIBIT 25



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs SHERIFF'S DEPARTMENT

CHRISTINE DIAZ-HERRERA, ESQ

March 05, 2025

Cheryl L. Marquis CSR No. 6731, Job No. 6456

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
3  
4 ALEX VILLANUEVA, ) NO.  
5 Plaintiff, ) 2:24-CV-04979 SVW (JCx)  
6 vs. )  
7 COUNTY OF LOS ANGELES, )  
8 COUNTY OF LOS ANGELES )  
9 SHERIFF'S DEPARTMENT, )  
10 LOS ANGELES COUNTY )  
11 BOARD OF SUPERVISORS, )  
12 COUNTY EQUITY OVERSIGHT )  
13 PANEL, LOS ANGELES )  
14 COUNTY OFFICE OF )  
15 INSPECTOR GENERAL, )  
16 CONSTANCE KOMOROSKI, )  
17 MERCEDES CRUZ, ROBERTA )  
18 YANG, LAURA LECRIVAIN, )  
19 SERGIO ESCOBEDO, RON )  
20 KOPPERUD, ROBERT G. LUNA, )  
21 MAX-GUSTAF HUNTSMAN, )  
22 ESTHER LIM, and DOES 1 )  
23 to 100, inclusive, )  
24 Defendants. )  
25 -----

17  
18 Deposition of CHRISTINE DIAZ-HERRERA, ESQ., taken  
19 on behalf of the Plaintiff remotely via Zoom  
20 Videoconferencing, commencing at 10:40 A.M. on  
21 Wednesday, March 5, 2025 before Cheryl L. Marquis,  
22 Certified Shorthand Reporter No. 6731.  
23  
24  
25



1     **APPEARANCES:**

2     **For Plaintiff:**

3                   **SHEGERIAN & ASSOCIATES, INC.**  
4                   **BY: ALEX DiBONA**  
5                   **ARTHUR ADAMIAN**  
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11     **For Defendants:**

12                   **MILLER BARONDESS, LLP**  
13                   **BY: JASON H. TOKORO**  
14                   **Attorney at Law**  
15                   **2121 Avenue of the Stars**  
16                   **Suite 2600**  
17                   **Los Angeles, California 90067**  
18                   **jtokoro@millerbarondess.com**

19     **Also Present:**

20                   **ALEX VILLANUEVA**  
21                   **S. WILLIAMSON**

22

23

24

25

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1

**THE WITNESS:**

2

**Christine Diaz-Herrera, Esq.**

3

4

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**Exhibit 1****Plaintiff Alex Villanueva's  
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**Exhibit 2****Los Angeles County Sheriff's  
Department Internal Affairs  
Bureau Investigative Report  
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**Exhibit 3****E-mail, Bates COLA001868-1871****124**

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**Exhibit 4****E-mail, Bates COLA001887-1889****136**

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**Exhibit 5****E-mail, Bates COLA001890-1893****141**

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**Exhibit 6****E-mail, Bates COLA001894-1898****144**

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**Exhibit 7****E-mail, Bates COLA001909-1914****146**

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**Exhibit 8****E-mail, Bates COLA001915-1921****152**

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**Exhibit 9****Los Angeles County Sheriff's  
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24

25

1 VIA ZOOM VIDEOCONFERENCING, WEDNESDAY, MARCH 5, 2025

2 10:40 A.M.

3 -0-

4 THE REPORTER: Ms. Diaz-Herrera, I'm going to  
5 place you under oath.

6 The witness, CHRISTINE DIAZ-HERRERA, ESQ.,  
7 was placed under oath by the Reporter  
8 as follows:

9 THE REPORTER: Do you solemnly state, under the  
10 penalty of perjury, that the testimony you will give in  
11 this matter will be the truth, the whole truth, and  
12 nothing but the truth?

13 MS. DIAZ HERRERA: I do.

14 THE REPORTER: Thank you.

15 You may proceed.

16

17 EXAMINATION

18 BY MR. DiBONA:

19 Q Thank you. Can you please say and spell your  
20 full name for the record?

21 A Christine Diaz-Herrera. First name is spelled  
22 C-h-r-i-s-t-i-n-e, last name is D-i-a-z hyphen  
23 H-e-r-r-e-r-a.

24 Q Thank you. And do you go by Miss Diaz-Herrera?

25 A That would be fine.

1 with anyone else, at least initially, in the Office of  
2 County Counsel?

3 A No.

4 Q And what were the names of the two individuals  
5 in the Sheriff's Department that they gave you?

6 A To be honest, I know one was Piero, and I don't  
7 know how to spell it because it's a -- and I forget what  
8 Piero's last name is. And then the other person I  
9 forget his name as well. I'm sorry, this -- it was a  
10 while back. It's something with the name John in it.  
11 To be honest, I have since forgotten, to be quite frank.

12 Q Is it John Carter?

13 A Yes, that's it.

14 Q And did you speak with -- sorry.

15 Do you have an understanding of what rank John  
16 Carter has in the Sheriff's Department?

17 A If I'm being honest, I did not have a very  
18 nuanced understanding of his rank or, you know, where he  
19 -- no.

20 Q Did you have an understanding that John Carter  
21 was in the Internal Affairs Bureau?

22 A That, yes, I was aware of that, yes.

23 Q And what, if anything, did Mr. Carter tell you?

24 A Mr. Carter gave me information about generally  
25 how they conduct investigations, so for example, they

1 always record, so he gave me information about like, you  
2 know, when you -- when you conduct an investigation you  
3 should have a recording of it. I think he would check  
4 in every so often with an e-mail saying, you know, just  
5 wanting an update of who had been interviewed or I think  
6 that's their process for like keeping records of like,  
7 you know, whose been interviewed, who has been contacted  
8 that type of thing. So I know that he would  
9 occasionally e-mail me and just kind of check in and  
10 say, oh, you know, kind of like an update, status  
11 update, like who has been interviewed, what's the status  
12 of where you are at.

13 Also he and I would e-mail along with Piero if  
14 I was having any kind of issue with scheduling an  
15 interview or getting a hold of someone.

16 So it was real basic, kind of support. It  
17 wasn't very -- he wasn't telling me how to conduct my  
18 investigation or what to do, but you know, giving me  
19 basic support. Because I was outside of the Sheriff's  
20 Department, I really didn't have an understanding of,  
21 you know, who were like the hierarchy or who I should  
22 contact or who was the right person to contact to  
23 interview certain people.

24 Q By the way, is Edward -- is his last name  
25 Montelongo?

1           A     Yes.

2           Q     Okay. And did you, at least initially in the  
3 investigation, did you meet with a woman by the name of  
4 Ann Devane?

5           A     Say that name again.

6           Q     Ann Devane.

7           A     It does not sound familiar to me, no.

8           Q     Other than Mr. Carter telling you that your  
9 interviews should be recorded, did he give you any other  
10 instructions on how to conduct interviews?

11          A     He gave me their admonitions, so he gave me  
12 like a sheet. Because there is a particular process, in  
13 terms of setting up an interview with someone who is  
14 sworn and so he gave me the admonitions. He also gave  
15 me kind of the notification that you would send out to  
16 them prior to try to set up that interview. So he did  
17 give me that -- that information.

18          Q     And anything other than giving you the  
19 admonitions and the saying that the interviews should be  
20 recorded? Did he give you anything else on how he  
21 conducted investigations or how you were expected to  
22 conduct yourself?

23          A     No. I do think at some point, they did give me  
24 -- I think they might have given me a reference to the  
25 County policy about, you know, cooperation with

1 Esther Lim?

2 A You have to forgive me. This was three years  
3 ago, so I'm trying to recall. As far as I can recall,  
4 that was it.

5 Q And did you yourself -- during the  
6 investigation, did you consider that you were an  
7 independent investigator?

8 A Yes.

9 Q In other words -- and you -- is it fair to say  
10 in the process of doing the investigation, you believed  
11 it was important that you not pre-judge the outcome, is  
12 that fair to say?

13 A Yes.

14 Q And -- excuse me.

15 Did you come to any conclusions with respect to  
16 your investigation?

17 A Can you be more clear what you mean by coming  
18 to a conclusion?

19 Q Yes, as an independent investigator, did you  
20 make any determinations that Sheriff Villanueva violated  
21 any County policy?

22 A Because I left before the actual report was  
23 created, I did not make any determinations.

24 Q Do you have an understanding -- do you --  
25 excuse me.



1           If you had not left Sanders Roberts, were you  
2   intending to make an actual conclusion about whether  
3   there was a violation of policy?

4           A     I didn't get the opportunity to interview the  
5   Sheriff, so I can't say what findings, if any, I would  
6   have made because I never got a chance to interview him.  
7   And I didn't get a chance to write the report.

8           Q     Oh, understood. And just to be clear, what you  
9   are saying is -- I think I understand it -- you never  
10   got a chance to make any findings, is that fair?

11          A     Right.

12          Q     And I'm sorry, my question might have been  
13   unclear. I will rephrase it.

14                My question was, were you planning, if you had  
15   stayed, would your report have included a finding that  
16   there was a violation of policy?

17          A     I couldn't say.

18          Q     Let me rephrase it another way.

19                When you are an independent investigator, did  
20   you consider it your job in the Sheriff Villanueva  
21   investigation to simply lay out the facts and leave it  
22   to others to determine what conclusions to draw from  
23   those facts, or were you planning to say here are the  
24   facts and I conclude, based on these facts, X-Y or Z?

25                MR. TOKORO: Objection. Asked and answered.

1 Q Okay. And when it says -- do you have any  
2 knowledge of what it means when it says,  
3 "Incident Date: Between July 28, 2021, and March 2nd  
4 2022"?

5 A No.

6 Q Do you have an understanding of what it means  
7 when it says, "Department Knowledge: March 16, 2022"?

8 A No.

9 Q And do you know what it means when it says,  
10 "Statute Date: March 15, 2023"? Do you know what that  
11 refers to?

12 A No. I would have to speculate.

13 Q And I'm just going to scroll down for a moment  
14 to -- this is page 7 of the document. It's COLA002126.  
15 Do you recognize this document?

16 MR. TOKORO: Alex, can you zoom in? It's  
17 really tiny on our end?

18 THE WITNESS: Let me put my glasses back on so  
19 I don't -- I don't believe I have seen this prior, no.  
20 I don't recognize it.

21 Q BY MR. DiBONA: And -- excuse me. The Bates  
22 stamp COLA002129, do you recognize this portion of the  
23 document?

24 A No, I -- on May 19, 2023, I did not work for  
25 Sanders Roberts. I had already left, which actually

1 reminds me, I think when we spoke earlier and I think I  
2 gave you dates, I think I gave you the wrong dates  
3 because I actually in June of 2023 did not work at  
4 Sanders Roberts. So I think I was off by a year in  
5 terms of the timing of the investigation and when I was  
6 doing my work. So I apologize for that. But, yeah, in  
7 2023, I no longer worked at Sanders Roberts, so I had  
8 nothing to do with the creation of this document. This  
9 doesn't even look like something that I started. This  
10 looks like it has -- I didn't do anything -- this is not  
11 my document. I did not prepare this.

12 Q Do you see where it just says -- where it says,  
13 from Sanders Roberts LLP?

14 A Correct.

15 Q And so is it fair to say you don't know who at  
16 Sanders Roberts LLP wrote this report?

17 A I have no idea.

18 Q And is it fair to say this document does not  
19 reflect your work product?

20 MR. TOKORO: Objection. Vague and ambiguous.  
21 You also haven't shown her the entire document.

22 MR. DiBONA: You may answer, Ms. Diaz-Herrera.

23 THE WITNESS: I couldn't say. I haven't seen  
24 the document.

25 Q BY MR. DiBONA: All right. Do you -- separate

1 Q And do you see here on number 5, Investigative  
2 Interview Summaries, do you see that?

3 A Yes.

4 Q Did you draft these interview summaries?

5 A Yes.

6 Q And so even though you didn't prepare this  
7 document this interview summary is something that you  
8 wrote, is that right?

9 A Yes. I think so. Honestly. I will take that  
10 back. I can't see all of these, so I can't say for  
11 certain. What I can see right there for Kyla Coates in  
12 that first paragraph looks familiar. But, again,  
13 without having seen all of it, I cannot -- I cannot  
14 speak to all of it. I can speak to only the first two  
15 paragraphs that I can see, and that looks like something  
16 I wrote.

17 Q Just to be clear, what you see on the screen  
18 right now with regard to Kyla Coates, that's familiar  
19 because that's something you wrote, is that fair to say?

20 A Yes.

21 Q And did you record your interview with Kyla  
22 Coates?

23 A Yes.

24 Q How did you record it?

25 A I believe the interview was over Microsoft

1 Teams and Microsoft Teams has like a button that you can  
2 press that automatically records.

3 Q And do you still have a copy of that recording?

4 A It should be with Sanders Roberts.

5 Q Other than recording it during Microsoft Teams,  
6 did you report it in any other way? Like did you make a  
7 separate recording?

8 A I don't recall.

9 Q And while you were interviewing Miss Coates, is  
10 it fair to say you were taking notes?

11 A Yes.

12 Q And those notes, as far as you know, those  
13 would still be with Sanders Roberts, is that fair?

14 A Correct.

15 Q And I think you have said this, sorry if you  
16 did, your practice is not to do handwritten notes. It's  
17 to actually type while you are doing the interviews, is  
18 that fair?

19 A Yes.

20 Q So the notes that you would have taken, those  
21 would be, you know, word processor of some type, MS Word  
22 or something like that?

23 A Yes.

24 MR. TOKORO: Just so the record is clear, Alex,  
25 those notes have been provided to you, and it's a part

1           A     No.

2           Q     And in the previous 15 years, had you ever  
3     investigated a County Sheriff of any kind?

4           A     A County Sheriff, no.

5           Q     By the way, as I get the next exhibit, I'm  
6     going to ask you, there is a reference -- Mr. Villanueva  
7     references two certified letters. Did you send those  
8     letters -- sorry. Did you send the certified letters  
9     that are referenced?

10          A     I did not.

11          Q     Do you know who did?

12          A     I do not know.

13          Q     Sorry. It should come through any moment.  
14                 (Exhibit 5 was marked for identification  
15                 and is attached hereto.)

16                 All right. Do you see the document on your  
17     screen?

18          A     Yes.

19          Q     Okay. This is COLA001890 and it goes to 1893.  
20                 Do you recall receiving -- sorry, sending this  
21     e-mail to former Sheriff Alex Villanueva on February 9,  
22     2023?

23          A     Yes.

24          Q     And for the record, what does POE stand for?

25          A     Policy of Equity I believe, I think I was

1     referencing the CPOE.

2           Q     And there is a reference to which Policy of  
3     Equity he's alleged to have violated, is that correct?

4           A     Yes.

5           Q     And there is no reference to who was making the  
6     allegations, is that right?

7           A     Yes.

8           Q     And was there any reason why you didn't  
9     reference either Esther Lim or Max Huntsman in this  
10    e-mail?

11          A     He asked for the allegations and I gave them to  
12    him.

13          Q     Understood. Did you consider -- in your  
14    opinion, would there have been anything inappropriate if  
15    you said -- if you used the names of who was saying that  
16    he violated the policies of equity?

17          A     It's not typically my practice to include that  
18    information when someone is asking me for the  
19    allegations.

20          Q     And is there any reason it's part of your  
21    practice?

22          A     Again, I was asked for the allegations.  
23    Provided them. They are there.

24          Q     Understood. My question was just a little bit  
25    different. You said it was part of your practice, and I



1 MR. DiBONA: You may answer.

2 THE WITNESS: I never got a chance to interview  
3 him, so I don't know what he was thinking.

4 MR. DiBONA: I'm going to send Exhibit 8  
5 through the Chat.

6 (Exhibit 8 was marked for identification  
7 and is attached hereto.)

8 Q BY MR. DiBONA: Okay, see if this one comes up  
9 any better. Do you see Exhibit 8 on your screen?

10 A I'm just looking at it from the Chat since I  
11 couldn't read it either way, but if you would like for  
12 me to look at it from your screen, I will.

13 Q I apologize --

14 A No, no that's fine, but I can read it. That's  
15 fine as long as I can read it.

16 Q And Exhibit 8 is COLA001915, and it goes all  
17 the way to 1921.

18 Do you recall receiving this e-mail from  
19 Sheriff Villanueva or former Sheriff Villanueva on or  
20 about March 10th, 2023?

21 A You know what, to be honest, I don't know  
22 because that's -- actually, what day is that? March  
23 10th?

24 Q March 10th, 2023 is what the document says.

25 A That was actually, I believe, my last day at

1 Sanders Roberts, and based on the time 6:54, it's likely  
2 that I may not have seen it.

3 Q By the way, did you tell-- excuse me.

4 Did you tell -- sorry, strike that.

5 Did you make arrangements with anyone at  
6 Sanders Roberts to forward your e-mails to them to take  
7 over the investigation?

8 A (No response)

9 Q Sorry. It was an unclear question.

10 Do you know, one way or the other, if anyone at  
11 Sanders Roberts forwarded your e-mails to anyone at  
12 Sanders Roberts who was doing the investigation after  
13 you?

14 A I don't know what they did with my e-mails  
15 after I left.

16 Q All right. And so your testimony is -- sorry.  
17 Sorry to get so specific, but do you remember what time  
18 -- was there a time when you left Sanders Roberts on  
19 March 10th, 2023?

20 A Probably about five o'clock.

21 Q So is it your testimony that because this  
22 e-mail is at 6:54 P.M., you would not have had access to  
23 it?

24 A It's my testimony that Friday, March 10th at  
25 6:54 after I had already given notice, I was not

1 checking that e-mail.

2 Q Understood. And do you know -- do you have a  
3 recollection, one way or another, if your access was cut  
4 off or were you simply not checking it?

5 A Again, I don't believe my access was cut off on  
6 that day that quickly, but again, I -- given that I  
7 believe my first day at work at my new job was March  
8 13th, I'm pretty sure I was not reading my e-mails from  
9 Sanders Roberts on Friday at 6:54 P.M.

10 Q Understood. And the reason you weren't reading  
11 it is because you no longer worked there, is that fair  
12 to say?

13 A Yes.

14 Q No other reason other than that, is that fair?

15 A Correct.

16 Q All right. And then just to be clear, is it  
17 fair to say, then, the first time you are seeing this  
18 e-mail is me showing it to you now?

19 A I believe so, yes.

20 Q And I believe -- just so I'm clear, you would  
21 have never responded to this e-mail, is that fair?

22 A I don't recall seeing it. I believe this is  
23 the first time I'm seeing it. I did not respond to this  
24 e-mail. I know that for a fact.

25 Q And you -- fair to say you don't know if anyone

1 at Sanders Roberts responded to this e-mail, is that  
2 fair?

3 A I don't know what they did with my e-mails  
4 after I left.

5 Q All right. Just for the record, it says,  
6 "You don't have a standard practice regarding  
7 making a subject out of someone you have no  
8 jurisdiction over and engaging in something the  
9 department has never done before. I would love to  
10 help you, however, your terms are unethical and  
11 unacceptable. I simply asked you what the issue was  
12 about. I don't need to know the specific questions  
13 you are going to ask. Example, Captain So-in-so  
14 alleges that he was denied X position because he did  
15 X-Y-Z."

16 Did I read that correctly?

17 A Sure.

18 Q As you sit here today, do you think there is  
19 anything inappropriate about Sheriff Villanueva saying I  
20 don't need to know the specific questions, I just want  
21 to know so-in-so alleges X because of X-Y-Z?

22 MR. TOKORO: Objection. Vague and ambiguous as  
23 to what you mean by "inappropriate." Also lacks  
24 foundation and calls for speculation regarding what  
25 Sheriff Villanueva was saying. And also irrelevant what

1 Sheriff Villanueva felt about how the investigation was  
2 being conducted.

3 MR. DiBONA: You may answer.

4 THE WITNESS: I can't answer that question.

5 Q BY MR. DiBONA: Just to be clear, as you sit  
6 here today, you don't have an opinion, one way or  
7 another, on whether this request is appropriate?

8 A I believe my request was very appropriate. I  
9 believe that I gave him enough information to be  
10 prepared for the interview, to know -- have a sense of  
11 what was happening -- I mean to have a sense of what the  
12 investigation was about. I believe what I gave him was  
13 standard to what you would give a subject. I don't --  
14 that's -- that's what I think.

15 Q My question was a little different, because you  
16 said "I can't answer that question," so my followup was  
17 you don't -- is it fair to say, then, you don't have an  
18 opinion, one way or the other as you sit here today, on  
19 this request from Sheriff Villanueva?

20 MR. TOKORO: Objection. Asked and answered  
21 just now.

22 MR. DiBONA: You may answer.

23 THE WITNESS: I believe the information I gave  
24 him was appropriate and responsive to his request.

25 Q BY MR. DiBONA: My question is different.

1 Because I know you haven't seen this request before, so  
2 I'm asking you, are you able to now have an opinion, one  
3 way or another, on whether it's appropriate or not?

4 MR. TOKORO: Same objections. Asked and  
5 answered. And also not relevant whether she has an  
6 opinion now one way or the other.

7 THE WITNESS: I just can't answer that question  
8 whether it's appropriate. I can tell you that I gave  
9 him the information that was requested.

10 MR. DiBONA: We have been going a while. Why  
11 don't we take a break and come back at 3:30.

12 MR. TOKORO: Okay.

13 (Recess taken from 3:26 P.M. to  
14 3:37 P.M.)

15 Q BY MR. DiBONA: Ms. Diaz-Herrera, you  
16 understand you are still under oath?

17 A Of course.

18 Q And is there any reason you can't continue to  
19 give your best testimony?

20 A No.

21 Q Did you ever tell Sheriff Villanueva that you  
22 were leaving Sanders Roberts?

23 A I did not.

24 Q And therefore, you never told him I'm leaving,  
25 contact this person for any questions you may have or

1 anything like that, is that fair?

2 A That is fair.

3 Q So as far as you know, Sheriff Villanueva  
4 wouldn't have any idea you were no longer at Sanders  
5 Roberts?

6 A No.

7 Q And as far as you are aware, Sheriff Villanueva  
8 would have no idea that it still wasn't you conducting  
9 the investigation, is that fair?

10 A I don't know what he knew.

11 Q I'm going to mark and send Exhibit 9.

12 Let me just ask you while I'm getting  
13 Exhibit 9, prior to Esther Lim's complaint, did you ever  
14 have any dealings with her?

15 Sorry, unclear question.

16 Prior to you interviewing Esther Lim in the  
17 context of this investigation, did you ever have any  
18 dealings with her?

19 MR. TOKORO: I'm going to make the objection  
20 that to the extent that you had any communications with  
21 Miss Lim in connection with any investigations that you  
22 may have done, and I don't know if you did, I would  
23 instruct you not to talk about those. But if you had  
24 any discussions with her outside of that context, you  
25 are free to answer.



1           A     No.

2           Q     And more broadly, have you ever given any  
3     statements to any media organization about Sheriff Alex  
4     Villanueva?

5           A     No.

6           Q     And to your knowledge, has any -- have you ever  
7     been asked to -- has there ever been a request for  
8     comment from any member of the media to you from Alex --  
9     in respect to Alex Villanueva?

10          A     No.

11          Q     The document it's COLA 002042 -- I'm sorry or  
12     43. It's this page. Do you recognize this document  
13     before -- or sorry, have you seen this document -- this  
14     page of the document before me showing it to you just  
15     now?

16          A     I believe it was -- I am not familiar -- this  
17     -- I didn't write this report, so I am not familiar with  
18     it.

19          Q     And to your knowledge, have you seen this  
20     document before me showing it to you right now?

21          A     I see it now. We have read it earlier. I  
22     think you are showing it to me now. I have not read it.  
23     I am not familiar with it.

24          Q     Do you see here under Allegation 1?

25          A     Yes.

1

2 STATE OF CALIFORNIA)

) ss.

3 COUNTY OF LOS ANGELES

)

4

5

6 I, CHERYL L. MARQUIS, hereby certify:

7 I am a duly qualified Certified Shorthand

8 Reporter in the State of California, holder of

9 Certificate Number CSR 6731 issued by the Court

10 Reporters Board of California, and which is in full

11 force and effect; (Fed. R. Civ. P. 28(a)).

12 I am authorized to administer oaths or

13 affirmations pursuant to California Code of Civil

14 Procedure, Section 2093(b) and prior to being examined,

15 the witness was first duly sworn by me. (Fed. R. Civ.

16 P. 28(a), 30(f)(1)).

17 I am not a relative or employee or attorney or

18 counsel of any of the parties nor am I a relative or

19 financially interested in this action. (Fed. R. Civ. P.

20 28).

21 I am the deposition officer that

22 stenographically recorded the testimony in the foregoing

23 deposition and the foregoing transcript is a true record

24 of the testimony given by the witness. (Fed R. Civ. P.

25 30(f)(1)).

1                   Before completion of the deposition, review of  
2   the transcript [X] was requested. If requested, any  
3   changes made by the deponent and provided to the  
4   reporter) during the review period allowed, are appended  
5   hereto. (Fed. R. Civ. P. 30(e)).

6

7   Dated: March 20, 2025

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# EXHIBIT 26

**In the Matter Of:**

**ALEX VILLANUEVA vs COUNTY OF LOS ANGELES**

**CONSTANCE MARIE KOMOROSKI**

**February 27, 2025**

**Job No. 6455**

**Express Deposition Services**



*by* **EXPRESSNETWORK**

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA , WESTERN DIVISION  
3

4 \_\_\_\_\_ )  
ALEX VILLANUEVA, )  
5 )  
Plaintiff, )  
6 )  
vs. ) Case No.:  
7 ) 2:24-cv-04979 SVW (JCx)  
COUNTY OF LOS ANGELES, COUNTY OF LOS )  
8 ANGELES SHERIFF'S DEPARTMENT, LOS )  
ANGELES COUNTY BOARD OF SUPERVISORS, )  
9 COUNTY EQUITY OVERSIGHT PANEL, LOS )  
ANGELES COUNTY OFFICE OF INSPECTOR )  
10 GENERAL, CONSTANCE KOMOROSKI, MERCEDES )  
CRUZ, ROBERTA YANG, LAURA LECRIVAIN, )  
11 SERGIO V. ESCOBEDO, RON KOPPERUD, ROBERT )  
G. LUNA, MAX GUSTAF HUNTSMAN, ESTHER )  
12 LIM, and DOES 1 to 100, inclusive, )  
 )  
13 Defendants. )  
\_\_\_\_\_)

14  
15  
16  
17 Videoconference Deposition of  
18 CONSTANCE MARIE KOMOROSKI, ESQ., taken on  
19 behalf of Plaintiff, Remote Via Zoom, beginning  
20 at 10:07 a.m., Thursday, February 27, 2025,  
21 before Cila Meyer, No. 4914, a Certified  
22 Shorthand Reporter.  
23  
24  
25

1 APPEARANCES OF COUNSEL:

2

3 For the Plaintiff:

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## 1 I N D E X

## 2 WITNESS

3 CONSTANCE MARIE KOMOROSKI, ESQ.

4

5 EXAMINATION BY: PAGE:

6 MR. DiBONA 5,155

7 MR. TOKORO 141

8

## 9 E X H I B I T S

10 Plaintiff's \*\* PAGE:

11 Exhibit 1 Plaintiff Alex Villanueva's First Amended 18  
12 Notice of Taking Deposition of Constance  
13 Komoroski and Request for Production of  
14 Documents

15 Exhibit 2 Document; Bates Nos. COLA 002035-2119 28

16 Exhibit 3 Document; Bates Nos. COLA 002120-2199 79

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## INSTRUCTION NOT TO ANSWER

PAGE LINE

137 14

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1 REMOTE VIA ZOOM, THURSDAY, FEBRUARY 27, 2025

2 10:07 A.M.

3 -oOo-

4

5 (The oath was administered to the  
6 deponent, CONSTANCE MARIE KOMOROSKI,  
7 ESQ., as follows:)

8 THE DEPOSITION OFFICER: Do you solemnly swear  
9 that the testimony you will give shall be the truth, the  
10 whole truth, and nothing but the truth, so help you God?

11 MS. KOMOROSKI: I do.

12

13 EXAMINATION

14 BY MR. DiBONA:

15 Q Thank you. Can you please say and spell your  
16 full name for the record, please.

17 A Yes. Constance, C-o-n-s-t-a-n-c-e, middle  
18 initial M. as in Mary, last name Komoroski,  
19 K-o-m-o-r-o-s-k-i.

20 Q Thank you. Do you have a middle name?

21 A Marie.

22 Q Other than Constance Marie Komoroski, have you  
23 ever been known by any other names?

24 A Not legally.

25 Q And have you ever had your deposition taken

1 assigned to a briefing, the panelists will review the  
2 documents, and, possibly, interviews, and exhibits that  
3 are part of an investigation of that individual's  
4 alleged misconduct.

5 BY MR. DiBONA:

6 Q At a certain point in time, did you -- excuse  
7 me -- were you involved on the CEOP in any type of  
8 complaint against former Sheriff Alex Villanueva?

9 A I was assigned to a panel that was briefing two  
10 investigations that had been completed regarding him as  
11 a subject, yes.

12 Q And who was on that panel?

13 A Based on my review of the calendar, it would  
14 have been myself, Roberta Yang, and Mercedes Cruz.

15 Q I think you may have touched on this earlier,  
16 but how was it that the three of you got on the panel  
17 that reviewed the two investigations in to former  
18 Sheriff Alex Villanueva?

19 A That would have been the magic of the staff  
20 collecting the availability of the panelists, and the  
21 availability of the investigations, and department  
22 representatives for a particular date.

23 Q If you know, how long has Ms. Yang been on the  
24 CEOP?

25 A I believe she started about six months to a

1 BY MR. DiBONA:

2 Q So Ms. Komoroski, I know there was some back  
3 and forth. Let me just ask you is referring to someone  
4 by the name they were born as an example of a violation  
5 of the County's policy and discrimination against race  
6 and national origin?

7 MR. TOKORO: Same objection contrary to your  
8 own allegations in your complaint, also contrary to the  
9 facts.

10 THE DEPONENT: In a vacuum, no.

11 BY MR. DiBONA:

12 Q And did you ever see any evidence that Sheriff  
13 Villanueva was listening in on Max Huntsman by a bug?

14 A I was not presented with anything other than  
15 what's in this report.

16 Q And were you ever presented with any evidence  
17 that Sheriff Villanueva swepted or swept Max Huntsman's  
18 emails?

19 A I was only presented with this report.

20 Q Understood. Just to be clear, in this report  
21 it says, "Max Huntsman said he does not necessarily  
22 believe that the sheriff's dirty tricks" --

23 In this report on the paragraph it says,  
24 "Mr. Huntsman said he does not believe" -- sorry.  
25 Strike that.

1 conclusion you reached after reviewing this report that  
2 Sheriff Villanueva's comment about Max Huntsman being  
3 Max Gustaf is a holocaust denier was harassment if you  
4 knew that Max Huntsman's father and grandfather were  
5 members of the Nazi Party?

6 A No.

7 Q Do you see here the name Veronica -- going  
8 down, it's on page 2048, do you see the name "Veronica  
9 Pawlowski"?

10 A I do.

11 Q Prior to receiving this report, did you have  
12 any -- excuse me -- did you have any communication with  
13 Veronica Pawlowski?

14 A No.

15 Q Prior to receiving this report, did you know  
16 who Ms. Pawlowski was in the context of working for the  
17 County of Los Angeles?

18 A No.

19 Q Do you see here where there's a reference to  
20 Sheriff Alex Villanueva's Facebook Live sessions?

21 A Yes.

22 Q And did you yourself ever review any of  
23 Sheriff Villanueva's Facebook Live sessions?

24 A No.

25 Q And you see here there's a reference to the

1 KFI radio talk show?

2 A Yes.

3 Q Did you yourself ever listen to any audio  
4 recording of the KFI appearances?

5 A No.

6 Q Just to be particular, did you ever yourself,  
7 whether or not it was reporting, did you ever turn on  
8 the radio and listen to Sheriff Alex Villanueva on KFI?

9 A No.

10 Q And so is it fair to say that your  
11 understanding of what the Facebook Live sessions contain  
12 come from their description in this report; is that  
13 right?

14 A Yes.

15 Q And your understanding of what was said on KFI  
16 comes from its description in this report, as well; is  
17 that right?

18 A Yes.

19 Q And you see here, there was -- there's, just  
20 for the record, I know you can see it, but there's a  
21 manila envelope with audios and transcripts sticker on  
22 it. Do you see that?

23 A I do.

24 Q Did you actually go in and listen to any of the  
25 audios that were attached to this report?

1 MR. TOKORO: Same objections.

2 THE DEPONENT: I believe there was a holocaust.

3 BY MR. DiBONA:

4 Q Un- -- un- -- understood. But would you agree  
5 with me that denying it is a denial of history?

6 MR. TOKORO: Objection; again, irrelevant.

7 THE DEPONENT: I suppose.

8 BY MR. DiBONA:

9 Q So what about a denial of history has to do  
10 with an individual's race or national origin?

11 MR. TOKORO: Objection; asked and answered  
12 several times now. It also misstates her prior  
13 testimony about why they reached the recommendation.

14 THE DEPONENT: The recommendation was not based  
15 on historical accuracy by any party. It was based on  
16 attributing holocaust denial to Mr. Huntsman,  
17 misarticulation of his name, and denouncing it in a  
18 questioning manner, I suppose, on social media and  
19 radio.

20 BY MR. DiBONA:

21 Q You believe that Sheriff Villanueva  
22 misarticulated Max Huntsman's name?

23 A Yes. And that's what Mr. Huntsman says, I  
24 should say.

25 Q Just to be clear, do you see the sentence under



1 Mr. Huntsman's name, the first sentence says,

2 "Mr. Huntsman was born Max Gustaf Edler"?

3 A I do.

4 Q So Max Gustaf was his first name; correct?

5 A I'm reading the same thing you are.

6 Q So how is Sheriff Villanueva referring to  
7 Max Huntsman as the first name he was born under  
8 misarticulating his name?

9 MR. TOKORO: Objection; vague and ambiguous.  
10 It's also misleading. Does not provide her with the  
11 entire context of that testimony under Mr. Huntsman's  
12 name.

13 THE DEPONENT: According to the report,  
14 Mr. Huntsman goes by Max Huntsman in the County and has  
15 done so for many years.

16 BY MR. DiBONA:

17 Q And just to be clear, you believe that that's  
18 the basis for saying his name was misarticulated?

19 A According to the report, that's what  
20 Mr. Huntsman says.

21 Q And do you agree with that?

22 A I found it persuasive or I wouldn't have joined  
23 the panel in making the recommendation that it was part  
24 of the totality of the circumstances leading to a  
25 recommendation.

1 on the totality of the circumstances; is that right?

2 A I'm sorry. I didn't understand that.

3 Q I will rephrase. In reviewing the allegations,  
4 when you, as a member of the CEOP, are reviewing this  
5 report in the transcript, you are trying to determine if  
6 these allegations have support based on the totality of  
7 the circumstances; would that be fair?

8 A That sounds correct.

9 Q You also have an understanding that the County,  
10 this policy against age discrimination applies to  
11 individuals age 40 and over.

12 Is that your understanding?

13 A Yes.

14 Q And just to be clear, at the very bottom of  
15 this page, you see where it says:

16 "The County will not tolerate unlawful  
17 discrimination on the basis of sex, race, color,  
18 ancestry, religion, national origin, ethnicity, age 40  
19 or over," and it goes on.

20 Did I read that correctly?

21 A That's what I'm reading.

22 Q So you understood in reviewing these  
23 allegations that for there to be a finding of a  
24 violation based on the County's policy against age  
25 discrimination, the age reference would have to be to

1 above.

2 BY MR. DiBONA:

3 Q Yes. So referring to someone as young doesn't  
4 reference a protected class; is that right?

5 MR. TOKORO: Same objection; misstates the  
6 record. Is also potentially calling for a legal  
7 conclusion.

8 THE DEPONENT: I don't have anything to add to  
9 my prior response.

10 BY MR. DiBONA:

11 Q Let me rephrase it slightly. Under the  
12 Los Angeles County's policies against discrimination,  
13 there's no protected class young, is there?

14 MR. TOKORO: Objection; vague and ambiguous,  
15 and also may lack foundation, and calls for speculation  
16 regarding the County's policies across the board.

17 THE DEPONENT: I would say that to the extent  
18 the word "young" is used to reflect someone under 40, it  
19 may not fall into the category that's articulated as a  
20 protected class under the policy for age.

21 BY MR. DiBONA:

22 Q And do you have an understanding of what the  
23 term woke means?

24 A I do not, except that it is a young -- may have  
25 to do with consciousness.

1 Q And so do you have any reason to believe woke  
2 20-somethings that work at the alter of wokeness has  
3 anything to do with an individual's race or national  
4 origin?

5 MR. TOKORO: Objection. Question is vague and  
6 ambiguous and does not take into account all of the  
7 allegations made in the complaint.

8 THE DEPONENT: Not specifically, no.

9 BY MR. DiBONA:

10 Q Do you have any reason to believe that woke  
11 20-somethings that prohibit the alter of wokeness has  
12 any reference to an individual's gender?

13 MR. TOKORO: Same objection; incomplete, vague  
14 and ambiguous.

15 THE DEPONENT: It doesn't appear to be directed  
16 at gender specifically.

17 BY MR. DiBONA:

18 Q It goes on. There's a sentence here:  
19 (Reading:) He said that all -- all are women. Sheriff  
20 Villanueva said that the supervisors promote diversity,  
21 but the justice deputies are all women and unqualified.

22 Did I read that correctly?

23 A That's what I see.

24 Q Do you see any reference in this to Sheriff  
25 Villanueva saying women are unqualified for the position

1 because they're women?

2 A Yes.

3 Q Where is that?

4 A It's the dualism of using the words "together"  
5 under the introductory word of "Diversity."

6 Q So just to be clear, you're saying referring to  
7 someone as a woman and unqualified implies that  
8 they're -- because they're women they're unqualified?

9 MR. TOKORO: Objection; misstates the  
10 testimony.

11 The prior question was about what Villanueva  
12 said.

13 THE DEPONENT: I said when he says here that  
14 supervisors promote diversity, the implication in his  
15 statement following is that hiring women did not promote  
16 diversity because they were unqualified or some such  
17 thing.

18 BY MR. DiBONA:

19 Q Right. Do you believe that -- did you form the  
20 opinion that Sheriff Villanueva was saying women are  
21 unqualified by virtue of being women?

22 MR. TOKORO: Objection; asked and answered two  
23 times now.

24 THE DEPONENT: The implication from the  
25 sentence is that unqualified individuals were hired

1 because they were women.

2 BY MR. DiBONA:

3 Q "During those sessions, he has referred to the  
4 age of justice deputies which is alive and can be easily  
5 be fact checked."

6 Did I read that correctly?

7 A That's what I see.

8 Q He also says:

9 "The justice deputies are all female, even  
10 though Supervisor Mitchell has two male justice  
11 deputies."

12 Did I read that correctly?

13 A That's what I'm reading.

14 Q So when there's a reference to all the justice  
15 deputies, that includes a group that at least has two  
16 men in it; right?

17 A That's what --

18 MR. TOKORO: Objection; vague and ambiguous as  
19 to whether you're referring to Sheriff Villanueva's  
20 statement or the facts generally.

21 THE DEPONENT: What was the question?

22 MR. DiBONA: Can you read the question back,  
23 Ms. Meyer, please.

24 (The record was read as requested)

25 THE DEPONENT: A reference by whom?

1           THE DEPONENT: There are non CEOP policies that  
2 address truth in, for example, job applications,  
3 et cetera.

4 BY MR. DiBONA:

5           Q Just to be clear, there's no CEOP policy that  
6 you were determining Sheriff Villanueva violated,  
7 whether he told straight-up lies, is there?

8           MR. TOKORO: Objection; assumes facts regarding  
9 the existence of CEOP policies.

10          THE DEPONENT: A statement could be a violation  
11 if it is false and contains -- and is also a statement  
12 that contains words that violate the policy.

13 BY MR. DiBONA:

14          Q Understood. My question was different. I'll  
15 rephrase it. When you were reviewing this document to  
16 determine if there were any County policies that Sheriff  
17 Villanueva violated, were you checking to see if he was  
18 telling straight-up lies?

19          MR. TOKORO: Objection; vague and ambiguous.

20          THE DEPONENT: The context of fact or fiction  
21 in his statement is represented by Ms. Coates' statement  
22 in this report that says not all the deputies are women.  
23 Two are men.

24 BY MR. DiBONA:

25          Q It goes on, "In the last few years, Sheriff



1 Villanueva has blamed the board for defunding his  
2 department."

3 Did I read that correctly?

4 A I do see that.

5 Q Now, is defunding the department, does that  
6 have anything to do with an individual's race?

7 A I -- I don't know how to answer that. I don't  
8 know what's involved in defunding a department.

9 Q Do you consider the allegation that Sheriff  
10 Villanueva blamed the board for defunding his department  
11 to be an allegation there was any type of harassment or  
12 discrimination on the basis of race?

13 A Could you repeat that?

14 Q Do you believe that the allegation that Sheriff  
15 Villanueva has blamed the board for defunding his  
16 department has anything to do with harassment on the  
17 basis of race?

18 A I -- I don't understand that -- that question.

19 Q Did you consider in reviewing this report that  
20 if Sheriff Villanueva blames the board for defunding his  
21 department, that's a violation of the County's policy  
22 based on discrimination based on race?

23 A His opinion you mean?

24 Q Yes.

25 A It doesn't say anything about race.

1 Q And did you consider in reviewing this report  
2 that Sheriff Villanueva blaming the board for defunding  
3 the department, did you come to the conclusion that had  
4 anything to do with violation of the policy against age  
5 discrimination?

6 A It doesn't say anything about age, no.

7 Q And do you believe -- in reviewing this report,  
8 do you believe that the allegation that Sheriff  
9 Villanueva blamed the board for defunding the department  
10 has anything to do with harassment based on an  
11 individual's race or national origin?

12 A It doesn't specifically say that, no.

13 Q Do you, by the way, see anything under "Sheriff  
14 Villanueva's Live streams" that has a reference to an  
15 individual's race or national origin?

16 A You mean under this section titled --

17 Q Yes.

18 A -- "Facebook Live streams"?

19 Q Yes.

20 A The sentence you asked me about defunding the  
21 department has to do with retaliation.

22 Q Yes. I understand. I'm just asking broadly  
23 under "Sheriff Villanueva Facebook Live Streams," do you  
24 see any allegation in these four paragraphs that relates  
25 to a person's race or national origin?

1 Villanueva wrote a letter addressed to Supervisor Solis  
2 and cc'd the DOS and CEO."

3 Did I read that correctly?

4 A That's what I see.

5 Q "And Ms. Lim considered his letter to be  
6 harassment."

7 Did I read that correctly?

8 A That's what I read.

9 Q "The letter discussed Ms. Lim's social media  
10 post and called for opening up an investigation of her  
11 social media accounts, Ms. Lim believes the sheriff's  
12 request was unjustified."

13 Did I read that correctly?

14 A That's what I see.

15 Q Do you see anything in this paragraph that  
16 leads you to believe that Sheriff Villanueva wrote the  
17 letter because of Ms. Lim's race or national origin?

18 MR. TOKORO: Objection; once again, incomplete.  
19 Only referencing one paragraph of a 10-page report.

20 THE DEPONENT: I would have to read the whole  
21 report, put it in context, but it looks like part of the  
22 retaliation element.

23 BY MR. DiBONA:

24 Q What part of the retaliation element -- sorry.  
25 What part of the retaliation element are you referring

1 to?

2 A Retaliation for protected activity is a  
3 protected -- is a potential policy violation under the  
4 CEOP.

5 Q What was the protected activity?

6 A It states here that in her previous role of the  
7 ACLU she was critical of Sheriff Villanueva.

8 Q Just to be clear, you're saying that you read  
9 this paragraph as saying because she was critical of  
10 Sheriff Villanueva he wrote a letter asking for an  
11 investigation into her social media posts?

12 A I would say that does smack of retaliation,  
13 given that the comments were made in her social media  
14 posts.

15 Q What about it smacks of retaliation?

16 A It reads, "The letter discussed Ms. Lim's  
17 social media posts and called for opening up an  
18 investigation of her social media accounts."

19 Q What about that smacks of retaliation to you?

20 A Investigating an individual's social media post  
21 because they were critical of the individual making the  
22 request.

23 Q And where is there any evidence that Sheriff  
24 Villanueva investigated the social media post because  
25 Ms. Lim was critical of him?

1           A       I do not.

2           Q       Do you have any knowledge, as you sit here  
3 today, that Ms. Lim used profanity in those accounts  
4 towards Sheriff Villanueva?

5           A       I do not.

6           Q       Do you have any information that Ms. Lim said  
7 things that were very critical of law enforcement with  
8 respect to -- in those social media posts?

9           A       When she was at the ACLU?

10          Q       No. When she was with justice deputy before  
11 Hilda Solis.

12          A       I think you're mistaken.

13          Q       Just to be clear, you don't -- you didn't --  
14 you don't know from this report that the social media  
15 post at issue are from when Ms. Lim was a justice deputy  
16 for Hilda Solis; is that fair?

17          A       I don't think so. That's what it says. It  
18 says:

19                    "She acknowledged that in her previous role at  
20 the ACLU she was critical of Sheriff Villanueva.  
21 Further, she said she had been critical of Sheriff  
22 Villanueva in her public social media post." That's a  
23 close quote.

24                    I took that to mean when she was at ACLU.

25          Q       And if it was actually the case that Ms. Lim

1 Villanueva.

2 THE DEPONENT: I would have to consider the  
3 totality of the statements alleged in the report.

4 BY MR. DiBONA:

5 Q I understand you'd have to consider the  
6 totality.

7 But my question is just is intellectual level  
8 the same as whether someone is over 40 or not.

9 MR. TOKORO: Same objections.

10 THE DEPONENT: The discrete phrase intellectual  
11 level in a vacuum is not the same as a person over 40 in  
12 a vacuum.

13 BY MR. DiBONA:

14 Q Can you see on the last paragraph, it says:

15 "There was a community town hall meeting where  
16 they recognized each other. He said 'Esther, go tell  
17 your boss that I want to debate her.'"

18 Did I read that correctly?

19 A That's what I see.

20 Q Is there anything inappropriate about Sheriff  
21 Villanueva saying to Ms. Lim, "Esther, go tell your boss  
22 that I want to debate her," in your opinion?

23 MR. TOKORO: Objection; incomplete and, once  
24 again, misleading.

25 You're trying to limit it to one statement and

1 not the totality of the statements by Villanueva.

2 THE DEPONENT: By itself it seems like a fairly  
3 pedestrian statement. I would have to consider it in  
4 the context of the entire report.

5 BY MR. DiBONA:

6 Q Do you see here there's a reference,  
7 July 28th, '21 statement on Facebook Live?

8 A July 28?

9 Q Yeah. "July 28, 2021 statement on Facebook  
10 Live."

11 Do you see that?

12 A I see that.

13 Q It says:

14 "In video he held and read from the motion.  
15 Sheriff Villanueva did not approve of the motion and  
16 said he did not think the drafter realized the  
17 implications of the motion."

18 Did I read that correctly?

19 A That's what it says.

20 Q Is there anything, in your opinion,  
21 inappropriate about Sheriff Villanueva saying he doesn't  
22 approve of a motion and he doesn't think the drafters  
23 realized the implications of it?

24 MR. TOKORO: Same objection; incomplete and  
25 misleading.



1           A       I see that title, yes, subtitle.

2           Q       All right. Do you see here where it says:

3                   "Ms. Lim has drafted many motions about  
4       accountability. As a result, Sheriff Villanueva goes  
5       after Ms. Lim and Supervisor Solis."

6                   Did I read that correctly?

7           A       I see that, yes.

8           Q       And before that it says:

9                   "She said that Sheriff Villanueva has tried to  
10      attack anyone with oversight of him."

11                  Did I read that correctly?

12          A       That's what it says.

13          Q       Someone with oversight over the sheriff's  
14      department, that's not related to their sex or gender,  
15      is it?

16                  MR. TOKORO: Once again, objection; incomplete,  
17      and misleading, and that you're going to a single  
18      sentence of a 10-page report.

19                  THE DEPONENT: A person's job description  
20      shouldn't include any of the protected categories;  
21      correct?

22      BY MR. DiBONA:

23          Q       And someone with accountability over the  
24      sheriff's department, that isn't related to their race  
25      or national origin, is it?

1 MR. TOKORO: Same objections.

2 THE DEPONENT: It's the same response.

3 BY MR. DiBONA:

4 Q "Same response" being someone's job categories  
5 doesn't have any reference to their race or national  
6 origin; correct?

7 A Correct.

8 Q We don't -- for example, the County of  
9 Los Angeles, to your knowledge, doesn't say "only Asian  
10 women" or "only white men can have accountability  
11 provisions," nothing like that; correct?

12 MR. TOKORO: Same objections.

13 THE DEPONENT: I don't believe so.

14 BY MR. DiBONA:

15 Q And having oversight over the sheriff's  
16 department doesn't relate to whether you're over 40,  
17 does it?

18 MR. TOKORO: Same objections.

19 THE DEPONENT: It should not.

20 BY MR. DiBONA:

21 Q As a matter of fact, in this paragraph Ms. Lim  
22 states that she's under 40 and, also, that she's drafted  
23 many motions related to oversight related to the  
24 sheriff's department; correct?

25 MR. TOKORO: Same objections.

1 DEPOSITION OFFICER'S CERTIFICATE

2

3 STATE OF CALIFORNIA )  
4 ) ss.  
5 COUNTY OF LOS ANGELES)

6

7 I, Cila Meyer, hereby certify: I am a duly  
8 qualified Certified Shorthand

9 Reporter, in the State of California, holder of  
10 Certificate Number CSR 4914 issued by the Court

11 Reporters Board of California and which is in  
12 full force and effect. (Bus. & Prof. 8016)

13 I am not financially interested in this action  
14 and am not a relative or employee of any attorney of the  
15 parties, or of any of the parties. (Civ. Proc.  
16 2025.320(a))

17 I am authorized to administer oaths or  
18 affirmations pursuant to California Code of Civil  
19 Procedure, Section 2093(b) and prior to being examined,  
20 the deponent was first placed under oath or affirmation  
21 by me. (Civ. Proc. 2025.320, 2025.540(a))

22 I am the deposition officer that  
23 stenographically recorded the testimony in the foregoing  
24 deposition and the foregoing transcript is a true record  
25 of the testimony given. (Civ. Proc. 2025.540(a))

I have not, and shall not, offer or provide any

1 services or products to any party's attorney or third  
2 party who is financing all or part of the action without  
3 first offering same to all parties or their attorneys  
4 attending the deposition and making same available at  
5 the same time to all parties or their attorneys. (Civ.  
6 Proc. 2025.320(b))

7 I shall not provide any service or product  
8 consisting of the deposition officer's notations or  
9 Comments regarding the demeanor of any witness,  
10 attorney, or party present at the deposition to any  
11 party or any party's attorney or third party who is  
12 financing all or part of the action, nor shall I collect  
13 any personal identifying information about the witness  
14 as a service or product to be provided to any party or  
15 third party who is financing all or part of the action.

16 (Civ. Proc. 2025.320(c))

17

18 Dated: March 10, 2025

19

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# EXHIBIT 27



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

VERONICA PAWLOWSKI

March 04, 2025

Lynn Ann Waters, RMR, CRR, CSR No. 14432, Job No. 6477

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3 WESTERN DIVISION  
4

5 ALEX VILLANUEVA,

6  
7 Plaintiff,

8 -vs- CASE NO. 2:24-cv  
-04979 SVW (JCx)

9 COUNTY OF LOS ANGELES, et al.,  
10 Defendants.

11 Deposition of  
12 VERONICA PAWLOWSKI

13 TUESDAY, MARCH 4, 2025  
10:00 a.m.

14 Taken via Zoom videoconference  
15

16 REPORTER: Lynn Ann Waters, RMR, CRR, CSR No. 14432  
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1     **APPEARANCES:**

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ALEX DiBONA, ESQ.  
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On behalf of the Defendant.

**ALSO PRESENT:**

Steven Williamson  
Alex Villanueva

1

## W I T N E S S I N D E X

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PAGE

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4

EXAMINATION  
VERONICA PAWLOWSKI  
BY MR. DiBONA

4

6

CONTINUED EXAMINATION  
VERONICA PAWLOWSKI  
BY MR. DiBONA:

121

8

## E X H I B I T I N D E X

9

EXHIBIT

MARKED

10

11 Exhibit 1, notice to take deposition, 120

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1 VERONICA PAWLOWSKI, of lawful age,  
2 being by me first duly sworn, as hereinafter  
3 certified, deposed and said as follows:

4 EXAMINATION OF VERONICA PAWLOWSKI

5 BY MR. DiBONA:

6 Q. Thank you.

7 Can you please say and spell your  
8 full name for the record.

9 A. Yes. Veronica Pawlowski.  
10 V-E-R-O-N-I-C-A and Pawlowski is P like Peter,  
11 A-W-L, like Larry, O-W-S-K-I.

12 Q. Thank you.

13 Have you ever had your deposition  
14 taken before?

15 A. No.

16 Q. So we're on the same page, do you  
17 understand that you have been placed under oath?

18 A. Yes.

19 Q. And do you understand that even  
20 though we're doing this deposition via Zoom that's  
21 the same oath you would take if we were in a court  
22 of law?

23 A. Yes.

24 Q. And, therefore, do you understand  
25 your testimony is subject to penalty of perjury

1       that -- excuse me.

2                       Do you recall anything specific  
3       that Sheriff Villanueva said that was disparaging  
4       and inappropriate about the board of supervisors  
5       themselves when he was addressing the board?

6                       MR. TOKORO:   Sorry, Alex.   We lost  
7       you there.

8                       Can you re-ask the question?

9                       MR. DiBONA:   Sure.

10       BY MR. DiBONA:

11                      Q.     Do you recall anything Sheriff  
12       Villanueva said that was disparaging and  
13       inappropriate about the board of supervisors  
14       themselves in addressing the board?

15                      A.     Are you referring to during his  
16       five minutes?

17                      Q.     Yes, at this point.   Yes.   Sorry.

18                      Let me rephrase it.

19                      During Sheriff Villanueva's five  
20       minutes addressing the board, do you recall  
21       anything disparaging and inappropriate he said  
22       about the board of supervisors himself?

23                      A.     Yes.

24                      Q.     What is that?

25                      A.     One specific comment I remember was

1 about supervisor Mark Ridley Thomas. And I  
2 remember comments being directed at my boss,  
3 Supervisor Sheila Kuehl.

4 Q. What comments do you remember that  
5 you considered to be disparaging and inappropriate  
6 regarding Mark Ridley Thomas?

7 A. Alluding to him as -- alluding to  
8 him as somehow not being worthy of the position of  
9 supervisor.

10 Q. How did Mark Ridley -- if you know  
11 -- how Mark Ridley Thomas left the board of  
12 supervisors?

13 A. Yes.

14 Q. How did he resign? Excuse me. How  
15 did he leave?

16 A. My recollection is that he termed  
17 out.

18 Q. And do you know where Mark Ridley  
19 Thomas is now?

20 A. No.

21 Q. Are you aware of any media reports  
22 of any legal trouble that Mark Ridley Thomas had?

23 A. Yes.

24 Q. Did you understand Mark Ridley  
25 Thomas to have been indicted for federal crimes?

1 A. Yes.

2 Q. And do you have any understanding  
3 that Mark Ridley Thomas was indicted for federal  
4 crimes during the course and scope of his work for  
5 the board of supervisors?

6 A. Yes.

7 Q. And did you have an understanding  
8 that there was a conviction?

9 A. Yes.

10 Q. And do you have an understanding  
11 that Mark Ridley Thomas did spend some time in  
12 federal prison?

13 A. Yes.

14 Q. And just to be clear, you believed  
15 it was disparaging and inappropriate for Sheriff  
16 Villanueva to say Mark Ridley Thomas was unworthy  
17 of the position on the board of supervisors or at  
18 least alluding to that?

19 A. Yes.

20 Q. And what disparaging and  
21 inappropriate thing, if any, do you remember  
22 Sheriff Villanueva saying about your boss  
23 Supervisor Kuehl during his five minutes?

24 A. I cannot remember specifics, but  
25 the sheriff made his feelings about Supervisor

1 Kuehl very well known.

2 Q. And even if you can't recall  
3 specifics, what is your understanding of what  
4 Sheriff Villanueva's feelings about Supervisor  
5 Kuehl were?

6 A. That she was corrupt.

7 Q. And do you recall how Sheriff  
8 Villanueva said she was corrupt?

9 A. Sheriff Villanueva had an  
10 understanding that Supervisor Kuehl had  
11 inappropriately assisted in the Peace over  
12 Violence contract with Metro.

13 Q. And what was your -- do you have an  
14 understand -- sorry. Let me just back up for a  
15 second.

16 Mark Ridley Thomas, may be obvious  
17 from the name, but he identifies as a man;  
18 correct?

19 A. Correct.

20 Q. And does he also identify as  
21 African-American; is that your understanding?

22 A. Correct.

23 Q. Did you ever hear Sheriff  
24 Villanueva make any sort of reference to Mark  
25 Ridley Thomas's gender at any time?



1 where you referred to Ballot Measure A as a  
2 measure that would allow the board to remove  
3 Sheriff Villanueva. You know very well that that  
4 is not what the board ballot measure was.

5 MR. DiBONA: And I'm sorry,  
6 Ms. Waters, can you repeat my last question and  
7 answer back just in the back and forth. I just  
8 want to reorient myself.

9 THE REPORTER: Sure. Just a  
10 second.

11 - - - -

12 (Thereupon, the requested portion of the record  
13 was read by the Reporter.)

14 - - - -

15 BY MR. DiBONA:

16 Q. You may answer subject to the  
17 objections of your counsel.

18 A. I don't recall if the vote was  
19 unanimous or if there was a vote.

20 Q. And just to be clear, you don't  
21 recall one way or the other if Sheriff Villanueva  
22 ever made any -- sorry.

23 Separate and apart from what he  
24 said or may or may not have said to the board of  
25 supervisors, do you recall Sheriff Villanueva ever

1 publically coming out against Ballot Measure A?

2 A. I remember that he was against  
3 public measure A or I'm sorry, Ballot Measure A.

4 Q. And did you ever discuss Sheriff  
5 Villanueva's opposition to Ballot Measure A with  
6 Supervisor Kuehl?

7 A. No.

8 Q. Do you recall how you became aware  
9 that Sheriff Villanueva was opposed to Ballot  
10 Measure A?

11 A. Because he made public comments  
12 that he was against the measure.

13 Q. And so just to be clear, you're not  
14 quite sure the form, but you do recall there were  
15 public statements that he was against Ballot  
16 Measure A; correct?

17 A. I recall statements that he was  
18 against Ballot Measure A, I don't recall the  
19 forum.

20 Q. Do you recall Sheriff Villanueva  
21 ever saying that in his opinion he believed Ballot  
22 Measure A was unconstitutional?

23 A. I don't recall.

24 Q. Do you recall there being a Ballot  
25 Measure R while you were a senior justice deputy

1 justice deputy, how were you involved in the  
2 implementation of Measure R?

3 A. Once Measure R passed, I had -- I  
4 did some work on the study that was passed in  
5 connection with Measure R. That was my  
6 involvement.

7 Q. To your recollection, did  
8 Supervisor Kuehl ever publically state her support  
9 for Ballot Measure A?

10 A. I don't remember.

11 Q. Did you ever publically state  
12 support for Ballot Measure A?

13 A. I don't recall.

14 Q. Did Supervisor Kuehl ever  
15 publically state any support for Ballot Measure R?

16 A. I don't recall.

17 Q. And do you recall if Supervisor  
18 Kuehl ever stated any opposition herself to Ballot  
19 Measure A?

20 A. I don't recall.

21 Q. And do you recall if Supervisor  
22 Kuehl ever stated any opposition to Ballot Measure  
23 R publically?

24 A. I don't recall.

25 Q. Do you have a recollection of there

1     being a Ballot Measure J while you were a senior  
2     justice deputy for Supervisor Kuehl?

3             A.     Yes.

4             Q.     And do you recall if Sheriff  
5     Villanueva made statements publically opposing  
6     Ballot Measure J?

7             A.     Yes.

8             Q.     And what, to your understanding, do  
9     you recall what his objections to Ballot Measure J  
10    was?

11            A.     I do recall.

12            Q.     What is your recollection?

13            A.     Essentially his complaint was that  
14    Ballot Measure J would result in a defunding of  
15    the sheriff's department, which is inaccurate.

16            Q.     What is your understanding of what  
17    Ballot Measure J does?

18            A.     So Ballot Measure J takes  
19    unrestricted -- and it's called MCC, it's  
20    essentially the county's flexible funding and  
21    allocates it to a couple of different types of  
22    social services including housing and  
23    community-based services for, you know, like  
24    mental health treatment and those types of things.

25            Q.     And do you recall if the board of

1 supervisors took a vote on Ballot Measure J?

2 A. I do recall.

3 Q. And did they take a vote?

4 A. Yes.

5 Q. And was that vote unanimous in  
6 favor of a Ballot Measure J?

7 A. I don't recall if it was unanimous.

8 Q. And do you recall if it passed?

9 A. Yes, it passed.

10 Q. And do you recall how Supervisor  
11 Kuehl voted?

12 A. Yes.

13 Q. And how did she vote on it?

14 A. She voted yes.

15 Q. Would it be fair then to say at  
16 least at this point there was a political  
17 disagreement in the sense, Supervisor Kuehl voted  
18 in favor of it and Sheriff Villanueva publicly  
19 opposed it; is that fair?

20 A. They did have a different point of  
21 view on measure J, absolutely.

22 Q. Did you, yourself, do any work on  
23 Ballot Measure J in your capacity as a senior  
24 justice deputy?

25 A. I did.

1 Q. What was your role in working on  
2 Ballot Measure J?

3 A. I wrote the motion to put, for the  
4 board to put Ballot Measure J on the ballot and  
5 I --

6 Q. Okay.

7 A. Oh, go ahead.

8 Q. No, go ahead. I'm sorry. I  
9 thought you were done. I don't want to cut off  
10 your answer. Please continue.

11 A. You know, and I had, you know, I  
12 did sort of like the background research that one  
13 must do in order to put a motion together.

14 Q. Is it fair to say that since you  
15 wrote the motion, you supported Ballot Measure J  
16 at least as far as your role as senior justice  
17 deputy for Supervisor Kuehl?

18 A. It's not fair to say that I  
19 supported it because I wrote the motion.

20 Deputies sometimes have to write  
21 motions and they're being written because it's the  
22 boss's position, not the deputy's position.

23 Q. Did you support Ballot Measure J?

24 A. I did.

25 Q. And did you have any position on

1     Ballot Measure R yourself?

2                   A.     I did not support Ballot Measure R.

3                   Q.     And did you have any position on

4     Ballot Measure A?

5                   A.     Yes.

6                   Q.     Did you support it?

7                   A.     As a voter, yes.

8                   Q.     Do you recall, during Sheriff

9     Villanueva's tenure the board of supervisors

10    implemented a vaccine mandate that, in part,

11    mandated vaccination by sheriff department

12    employees?

13                  A.     Yes.

14                  Q.     Do you recall the mandate was

15    broader? Was it true that all county employees

16    were mandated to be vaccinated against COVID-19?

17                  A.     That is my recollection.

18                  Q.     And, excuse me, that went to a --

19    was that a vote taken by the board of supervisors?

20                  A.     I don't remember.

21                  Q.     Do you recall how Supervisor Kuehl

22    -- sorry. Strike that.

23                           Do you recall if Supervisor Kuehl

24    publically supported the vaccine mandate?

25                  A.     I do. She supported it.



1 Q. And did you as a justice deputy or  
2 senior justice deputy, excuse me, did you do any  
3 work on the vaccine mandate in that respect?

4 A. In what respect?

5 Q. In your role as a senior justice  
6 deputy for Supervisor Kuehl; were you involved in  
7 the vaccine mandate in any way?

8 A. Yes.

9 Q. And what was your role?

10 A. I helped write a motion that had to  
11 do with the vaccine mandate, but I don't recall  
12 right now what the substance of that motion was, I  
13 was working on it with other people.

14 Q. And even if you don't recall the  
15 substance, is it fair to say the motion you wrote  
16 was in favor of the vaccine mandate; is that fair?

17 A. Yes.

18 Q. And did you have an understanding  
19 that Sheriff Villanueva publicly said he was not  
20 going to enforce the vaccine mandate with respect  
21 to disciplining sheriff department employees?

22 A. Yes.

23 Q. Unclear question.

24 Did you have an understanding that  
25 Sheriff Villanueva publically stated he would not

1 impose discipline on his employees if they chose  
2 not to become vaccinated?

3 A. Yes.

4 Q. So you understood he was saying he  
5 would not enforce the board of supervisors'  
6 mandate; is that fair to say?

7 A. Yes.

8 Q. You understood at the bare minimum  
9 there was a disagreement between the county's  
10 mandate and the sheriff not enforcing it; is that  
11 fair to say?

12 A. Yes.

13 Q. And did you ever discuss Sheriff  
14 Villanueva's public statements that he would not  
15 enforce the vaccine mandate with Supervisor Kuehl?

16 A. Yes.

17 Q. And what did you say to her with  
18 regard -- sorry.

19 How many conversations did you  
20 have?

21 A. I don't remember how many times we  
22 spoke about it.

23 Q. And what do you recall her --  
24 excuse me, what do you recall saying to her?

25 A. I recall that it was a very

1 and so there was another sort of thought process  
2 that, you know, if something like this were to  
3 result in, you know, like 70 percent of the  
4 sheriff's department saying, well, forget it, I'm  
5 not going to get this vaccine or I quit, or I, you  
6 know, silent -- what's it called? Silent quitting  
7 or like the probation department would do, I'm  
8 just going to -- what's it called? Like a blue  
9 call-out or whatever.

10 So it was a tough call, you know,  
11 and so I just remember having conversations with  
12 her weighing both sides of this very difficult  
13 coin and, so, yeah, those are the conversations I  
14 remember having with her.

15 Q. Do you recall Sheriff Kuehl[sic]  
16 ever -- excuse me, expressing any type of  
17 displeasure that Sheriff Villanueva was not going  
18 to enforce the mandate that the board of  
19 supervisors had voted on?

20 A. I just want to say you said  
21 "Sheriff Kuehl."

22 Q. Oh, excuse me. Sorry.

23 Do you recall Supervisor Kuehl ever  
24 saying or expressing any type of disagreement or  
25 disappointment that Sheriff Villanueva was not

1 enforcing the vaccine mandate that had been put in  
2 place by the board of supervisors?

3 A. Yes. It was very disappointing.

4 Q. And Supervisor Kuehl, did she ever  
5 express that she believes Sheriff Villanueva was  
6 acting contrary to public health if he didn't  
7 enforce the vaccine mandate?

8 A. I can't recall "contrary to public  
9 health," I don't recall that being said.

10 Q. Do you recall if Sheriff Kuehl ever  
11 said to you or words to the effect of that she  
12 believes Sheriff Villanueva was defying the board  
13 of supervisors?

14 MR. TOKORO: Same objection that  
15 the witness actually raised to your last question.  
16 You referred to Supervisor Kuehl as "Sheriff  
17 Kuehl" again.

18 MR. DiBONA: I might have, but --

19 BY MR. DiBONA:

20 Q. So do you recall Supervisor Kuehl  
21 ever saying words to the effect of that she  
22 believed that Sheriff Villanueva was defying the  
23 board of supervisors?

24 A. Yes. Because he was.

25 Q. It's fair to say Sheriff Kuehl did

1     they're not going -- they're not going to do it.

2                   Q.     And did Supervisor Kuehl ask you to  
3     do any research on how the board of supervisors  
4     could get Sheriff Villanueva to comply with the  
5     vaccine mandate?

6                   A.     Yes.

7                   Q.     And did you do that research?

8                   A.     Yes.

9                   Q.     And what, if anything, did you  
10    recommend to Supervisor Kuehl in that respect?

11                  A.     I didn't make a recommendation.

12                  Q.     What, if anything, did your  
13    research find with respect to that assignment that  
14    Supervisor Kuehl gave you?

15                  A.     I recall that the board did have a  
16    possible avenue of recourse. I don't recall what  
17    it was.

18                  Q.     Do you recall if the board took  
19    that avenue of recourse?

20                  A.     The board tried to.

21                  Q.     And do you recall what the board  
22    tried to do?

23                  A.     I don't. I don't.

24                  Q.     Is it fair to say, by the way, that  
25    Sheriff Villanueva while he was sheriff never

1 enforced the vaccine mandate; is that your  
2 understanding?

3 A. That is my recollection.

4 Q. And so is it fair to say that  
5 whatever the board tried for whatever reason, it  
6 was ineffective in actually getting him to do it.  
7 Is that fair?

8 A. Yes.

9 Q. Do you also recall -- sorry.  
10 While you were a senior justice  
11 deputy, do you recall sheriff -- excuse me.

12 While you were the senior justice  
13 deputy, do you recall the county of Los Angeles  
14 contracted with a company named Fulgent?

15 A. Yes.

16 Q. And do you recall what the county  
17 of LA contracted with Fulgent for in the context  
18 of the COVID-19 pandemic?

19 A. I believe the contract with Fulgent  
20 was for COVID testing.

21 Q. And did you, yourself, as a senior  
22 justice deputy, did you have any role in reviewing  
23 the contract between LA County and Fulgent?

24 A. No.

25 Q. And did -- excuse me.

1 Did the board of supervisors vote  
2 on giving that contract to Fulgent?

3 A. I don't recall.

4 Q. And do you recall Sheriff  
5 Villanueva making public statements with respect  
6 to Fulgent potentially sharing data with the  
7 Chinese government?

8 A. Yes, that did happen.

9 Q. And did you ever discuss Sheriff  
10 Villanueva's public statements with respect to  
11 Fulgent and the Chinese government with Supervisor  
12 Kuehl?

13 A. In passing.

14 Q. What do you recall saying to her?

15 A. I recall saying to her that I  
16 thought it was ridiculous.

17 Q. And how, if any, way did she  
18 respond to that?

19 A. Again, it was in passing so she  
20 just kind of said, you know, it's what he does.  
21 And we kept walking.

22 Q. Why did you believe it was  
23 ridiculous?

24 A. I just thought the whole notion was  
25 ridiculous.



1 Q. Sorry, what notion did you believe  
2 was ridiculous?

3 A. Fulgent selling information to the  
4 Chinese, I thought it was ridiculous.

5 Q. And why did you believe that?

6 A. Why did I believe it was  
7 ridiculous?

8 Q. Yes.

9 A. I don't know. I just thought it  
10 was ridiculous.

11 I thought the notion that Fulgent  
12 was selling data to the Chinese was ridiculous  
13 because we had no indication that that was  
14 happening, it just kind of came out of no where.

15 Q. Do you know one way or another if  
16 Fulgent has any type of physical presence in  
17 China?

18 A. I do not.

19 Q. Did you ever take any steps to ask  
20 Sheriff Villanueva why he believed Fulgent may be  
21 selling data to the Chinese government?

22 A. No, I did not ask him.

23 Q. Are you aware that Sheriff  
24 Villanueva was sued by Fulgent for defamation and  
25 other claims?

1 CERTIFICATE  
2 OF  
3 CERTIFIED SHORTHAND REPORTER

4 \* \* \* \*

5

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7

8 The undersigned Certified Shorthand  
9 Reporter of the State of California does hereby  
10 certify:

11 That the foregoing Deposition was taken  
12 before me at the time and place therein set forth,  
13 at which time the Witness was duly sworn by me.

14 That the testimony of the Witness and  
15 all objections made at the time of the Deposition  
16 were recorded stenographically by me and were  
17 thereafter transcribed, said transcript being a  
18 true and correct copy of the proceedings thereof.

19 In witness whereof, I have subscribed my  
20 name, this date: March 17, 2025.

21

22

23

24

25

*Lynn Ann Waters*

LYNN ANN WATERS, CSR NO. 14432



1605 W. Olympic Blvd., Suite 800 Los Angeles, CA 90015

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA vs COUNTY OF LOS ANGELES

VERONICA PAWLOWSKI, VOLUME II

April 04, 2025

Shannon D. Denney, CSR No. 10385, Job No. 7156

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No: 2:24-cv-04979
	)	SVW (JCx)
COUNTY OF LOS ANGELES, COUNTY OF	)	
LOS ANGELES SHERIFFS DEPARTMENT,	)	
LOS ANGELES COUNTY BOARD OF	)	
SUPERVISORS, COUNTY EQUITY	)	
OVERSIGHT PANEL, LOS ANGELES COUNTY	)	
OFFICE OF INSPECTOR GENERAL,	)	
CONSTANCE KOMOROSKI, MERCEDES CRUZ,	)	
ROBERTA YANG, LAURA LECRIVAIN,	)	
SERGIO V. ESCOBEDO, RON KOPPERUD,	)	
ROBERT G. LUNA, MAX-GUSTAF HUNTSMAN	)	
ESTHER LIM, and DOES 1 to 100,	)	
inclusive,	)	
	)	
Defendants.	)	
	)	

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DEPOSITION OF: VERONICA PAWLOWSKI

VOLUME II

April 4, 2025

REPORTED BY: SHANNON D. DENNEY, CSR No. 10385

1

**APPEARANCES**

2

3     **For the Plaintiff:**

4

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1 the way he's portraying you to be.

2 And I -- I guess I used the word "blown off."

3 I don't know she blew me off. She just said,  
4 basically, you're dreaming. That will never happen.

5 Q. Did you, yourself, ever reach out to any of  
6 the media about Sheriff Villanueva?

7 A. No. I was not allowed to do that. That is  
8 not something I would have been allowed to do.

9 Q. When you say that, is there -- was there a  
10 rule of Supervisor Kuehl's office against you reaching  
11 out to the media?

12 A. I would not say that it was against.

13 What I would say, it was a clear  
14 understanding. It's not like it was a written policy  
15 or rule. But there was a very clear understanding in  
16 our office that everything media related went through  
17 our communications staff.

18 Q. Understood. By the way, were you asking  
19 Sheila Kuehl's communications director to reach out to  
20 the media?

21 A. No. No. I was just saying to her, you know,  
22 it would be great if one of these people who write  
23 about him all the time had the curiosity to ask me  
24 about myself so that I had a way to rebut all these  
25 horrible things he's saying about my qualifications.



1 And she was, you know, like I said, she was just sort  
2 of like, you know, in no world is that going to happen,  
3 Veronica.

4 Q. Do you know the name of an LA Times reporter  
5 by the name of Keri Blakinger?

6 A. Yes.

7 Q. Has Ms. Blakinger ever reached out to you for  
8 comment regarding Sheriff Villanueva?

9 A. No.

10 Q. And even if she hasn't reached out, have you  
11 ever offered -- excuse me.

12 Have you ever reached out to Ms. Blakinger  
13 with respect to Sheriff Villanueva?

14 A. No.

15 Q. Do you have an understanding that Ms.  
16 Blakinger wrote an article about Sheriff Villanueva  
17 about having a "do not retire" notation placed atop his  
18 personnel file?

19 A. I don't recall.

20 Q. Did you ever speak with Esther Lim about  
21 wanting someone in the press to write about Sheriff  
22 Villanueva, and what he was saying about the justice  
23 deputies?

24 A. No. Not that I can remember.

25 Q. And did Esther Lim ever tell you that she

1     DEPOSITION ERRATA SHEET

2

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5     Case Caption:   Villanueva vs. County of Los Angeles

6

7

8                   DECLARATION UNDER PENALTY OF PERJURY

9             I declare under penalty of perjury that I have

10    read the entire transcript of my Deposition taken in

11    the captioned matter or the same has been read to me,

12    and the same is true and accurate, save and except for

13    changes and/or corrections, if any, as indicated by me

14    on the DEPOSITION ERRATA SHEET hereof, with the

15    understanding that I offer these changes as if still

16    under oath.

17

18             Signed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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1 STATE OF CALIFORNIA

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I, SHANNON D. DENNEY, CSR 10385, a Certified

Shorthand Reporter in and for the State of California,

do hereby certify that, prior to being examined, the

witness named in the foregoing deposition was by me

duly sworn to testify the truth, the whole truth, and

nothing but the truth; that said deposition was taken

down by me in shorthand at the time and place named

therein and was thereafter transcribed under my

supervision; that this transcript contains a full, true

and correct record of the proceedings which took place

at the time and place set forth in the caption hereto.

I further certify that I have no interest in

the event of this action.

EXECUTED this 17th day of April, 2025.

Shannon D. Denney

Shannon D. Denney, CSR 10385

# EXHIBIT 28

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA, )  
)  
Plaintiff, )  
v. )  
) CASE NO.  
COUNTY OF LOS ANGELES, ) 2:24-cv-04979 SVW  
COUNTY OF LOS ANGELES ) (JCx)  
SHERIFF'S DEPARTMENT, )  
LOS ANGELES COUNTY BOARD OF )  
SUPERVISORS, COUNTY EQUITY )  
OVERSIGHT PANEL, LOS ANGELES )  
COUNTY OFFICE OF INSPECTOR )  
GENERAL, CONSTANCE KOMOROSKI, )  
MERCEDES CRUZ, ROBERTA YANG, )  
LAURA LECRIVAIN, SERGIO V. )  
ESCOBEDO, RON KOPPERUD, )  
ROBERT G. LUNA, MAX-GUSTAF )  
HUNTSMAN, ESTHER LIM, and )  
DOES 1 to 100, inclusive, )  
)  
Defendants. )  
)  
)

REMOTE VIDEO-RECORDED DEPOSITION  
OF  
TIMOTHY MURAKAMI  
MONDAY, APRIL 7, 2025

Stenographically Reported By:  
JENNIFER L. SMITH, CA CSR NO. 10358, RMR, CRR, CRC  
Job Number: 7246481

APPEARANCES

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ALSO PRESENT:

Tristan Knudsen, Videographer

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TIMOTHY MURAKAMI

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Exhibit 1	Amended Subpoena	14
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1 PURSUANT TO WRITTEN NOTICE and the  
2 appropriate rules of civil procedure, the Remote  
3 Video-Recorded Deposition of TIMOTHY MURAKAMI,  
4 called for examination by the Defendants, was taken  
5 via Zoom, commencing at 10:03 AM on Monday,  
6 April 7, 2025, before Jennifer L. Smith, California  
7 CSR No. 10358, Washington CCR No. 3101, RMR, CRR,  
8 CRC.



P R O C E E D I N G S

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THE VIDEOGRAPHER: Good morning. We're  
going on the record at 10:03 AM on the 7th of April, 10:03:34  
2025. 10:03:39  
Please note that the deposition today is 10:03:39  
being conducted virtually. The quality of the 10:03:46  
recording depends on the quality of the camera and 10:03:49  
the Internet connection of participants. What is 10:03:52  
seen from the witness and heard on screen is what 10:03:54  
will be recorded. 10:03:56  
Audio and video recording will continue to 10:03:57  
take place unless all parties agree to go off the 10:03:59  
record. 10:04:02  
This is Media Unit Number 1 of the 10:04:03  
video-recorded deposition of Tim Murakami, taken by 10:04:06  
counsel for defendants in the matter of Alex 10:04:12  
Villanueva versus County of Los Angeles, et al., 10:04:15  
filed in the United States District Court, Central 10:04:20  
District of California, Western Division, Case Number 10:04:22  
2:24-cv-04979 SVW (JCx). 10:04:26  
My name is Tristan Knudsen, representing 10:04:28  
Veritext Legal Solutions, and I'm the videographer. 10:04:42  
I am not related to any party in this action, nor am 10:04:44  
I financially interested in the outcome. 10:04:48

1 We're off the record. 11:24:22

2 (Recess taken.) 11:24:23

3 THE VIDEOGRAPHER: This marks the beginning 11:29:32

4 of Media Number 3. The time is 11:29 AM. We're on 11:29:34

5 the record. 11:29:38

6 BY MR. NEACH: 11:29:38

7 Q. So I've been informed I was consistently 11:29:42

8 referring to Esther Lim as Edith Lim. 11:29:44

9 So when I -- when I asked any questions 11:29:47

10 about it, did you mean that to be Esther Lim when I 11:29:51

11 was asking those questions of you? 11:29:55

12 A. Yes, sir. 11:29:57

13 Q. Okay. And just to make sure, I think one of 11:29:58

14 the last ones I asked, do you recall at any point the 11:29:59

15 Sheriff indicating to you that there needs to be an 11:30:01

16 investigation of Esther Lim? 11:30:04

17 A. No, sir. 11:30:05

18 Q. Okay, sir. 11:30:07

19 I appreciate your time, and I don't have any 11:30:08

20 further questions at this point. 11:30:10

21 11:30:13

22 EXAMINATION 11:30:13

23 BY MR. DIBONA: 11:30:14

24 Q. Okay. Sir, just some follow-up questions. 11:30:14

25 Mr. Murakami, at the beginning we 11:30:17

1 established you're very familiar with the rules of 11:30:19  
2 deposition. I assume you know the rules still apply 11:30:21  
3 even when I'm asking the questions. 11:30:25  
4 Is that -- does that make sense to you? 11:30:27  
5 A. Yes, sir. 11:30:28  
6 Q. All right. And while you were with the 11:30:29  
7 Sheriff's Office, was there ever any type of 11:30:33  
8 investigation into counsel -- sorry, excuse me. 11:30:36  
9 Was there any type of investigation into a 11:30:39  
10 member of the Board of Supervisors named Sheila 11:30:42  
11 Kuehl? 11:30:45  
12 A. Yes, sir. 11:30:46  
13 Q. And did you have any role in that 11:30:47  
14 investigation? 11:30:49  
15 A. Yes, sir. 11:30:51  
16 Q. What was your role in that investigation? 11:30:52  
17 A. Well, the lead unit conducting the 11:30:56  
18 investigation was the public corruption detail, and 11:30:58  
19 they reported directly to me. 11:31:03  
20 Q. And are you aware that some critics of that 11:31:05  
21 investigation have charged that that investigation 11:31:08  
22 was politically motivated? Are you aware of that? 11:31:11  
23 A. Yes, sir. 11:31:15  
24 Q. What's your response? Was that 11:31:16  
25 investigation politically motivated? 11:31:18

1	A. No, sir.	11:31:21
2	Q. And what -- what's the basis for your	11:31:22
3	opinion? Meaning, what facts can you put forward, if	11:31:25
4	any, to show that it wasn't politically motivated?	11:31:29
5	A. The -- the investigation itself had nothing,	11:31:34
6	per se, to do with the department or our interests.	11:31:41
7	It came across us from a whistleblower within the	11:31:44
8	MTA.	11:31:47
9	Q. And do you recall how it came across --	11:31:50
10	sorry.	11:31:53
11	Do you recall how that whistleblower came to	11:31:53
12	the department?	11:31:56
13	A. I'm not exactly sure how she contacted us,	11:31:59
14	but I know it came -- became -- it came to our	11:32:02
15	attention, and we believe it warranted further	11:32:05
16	investigation.	11:32:09
17	Q. And did you ever take any action as head of	11:32:10
18	the public corruption unit to retaliate against any	11:32:13
19	perceived political enemies of the Sheriff Alex	11:32:17
20	Villanueva?	11:32:21
21	A. No, sir.	11:32:22
22	Q. Did then-Sheriff Alex Villanueva ever ask	11:32:23
23	you to take any action, retaliatory to any of his	11:32:26
24	perceived political enemies?	11:32:29
25	A. No, sir.	11:32:31

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1 Q. Was the public corruption unit set up by 11:32:32  
2 Alex Villanueva to retaliate against his political 11:32:35  
3 enemies, perceived or otherwise? 11:32:38  
4 A. No, sir. 11:32:41  
5 Q. Do you -- earlier opposing counsel asked you 11:32:42  
6 about you skip -- skipping some ranks; is that right? 11:32:47  
7 A. Yes, sir. 11:32:50  
8 Q. The Sheriff -- and I'm -- your terms in law 11:32:51  
9 enforcement, are you familiar with the term "quid pro 11:32:56  
10 quo"? 11:32:58  
11 A. Yes, sir. 11:32:59  
12 Q. A Latin term lawyers use meaning this for 11:33:00  
13 that. 11:33:04  
14 Is that your understanding? 11:33:05  
15 A. Yes, sir. 11:33:06  
16 Q. And more colloquially it means, if I do this 11:33:06  
17 for you, will you give me something? Is that, 11:33:09  
18 broadly speaking, your understanding? 11:33:12  
19 A. Yes, sir. 11:33:13  
20 Q. Did Sheriff Villanueva ever ask you for a 11:33:14  
21 quid pro quo in return for him skipping -- letting 11:33:16  
22 you skip ranks to promote you? 11:33:23  
23 A. No, sir. In fact, when I had any concerns 11:33:25  
24 about decisions, I would voice my opposition, and I 11:33:31  
25 had concerns that maybe I'd be asked to leave, and I 11:33:37

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1 guess he got wind of that. He called me in and said, 11:33:42  
2 "You're not planning on leaving, are you?" 11:33:49  
3 And I said, "No. I don't plan on it but." 11:33:51  
4 And he goes, "No. Good. I need you, 11:33:53  
5 because I need you to tell me what you think." So 11:33:54  
6 actually he wanted my -- my voice in that room to 11:33:57  
7 tell him what I thought. 11:34:00  
8 Q. And if Sheriff Villanueva asked you to do 11:34:02  
9 anything illegal, would you do it because you're a 11:34:04  
10 friend of his? 11:34:08  
11 A. No, sir. 11:34:10  
12 Q. And if Sheriff Villanueva asked you to do 11:34:11  
13 anything unethical, would you do it because you're a 11:34:13  
14 friend of his? 11:34:15  
15 A. No, sir. 11:34:17  
16 Q. If Sheriff Villanueva asked you to do 11:34:18  
17 anything illegal, would you do it because he had 11:34:20  
18 promoted you and had you skip ranks? 11:34:22  
19 A. No, sir. 11:34:27  
20 Q. In your presence did Sheriff Villanueva ever 11:34:29  
21 use any offensive language towards anybody's race? 11:34:33  
22 A. No, sir. 11:34:37  
23 Q. And I apologize for asking it, but since 11:34:38  
24 this is an issue in the case, how do you identify 11:34:41  
25 ethnically, sir? 11:34:44

1 A. Japanese American, sir. 11:34:45

2 Q. Did Sheriff Villanueva ever treat you any 11:34:47

3 differently because you're Japanese or Asian? 11:34:50

4 A. No, sir. 11:34:53

5 Q. And did Sheriff Villanueva treat -- and, 11:34:55

6 sorry, sir. 11:34:58

7 How old are you, as you sit here today? 11:34:59

8 A. Oh, gee, I need -- that's -- 67, sir. 11:35:02

9 Q. And at the time Sheriff Villanueva promoted 11:35:08

10 you, you would have been in your 60s; is that right? 11:35:11

11 A. Yes, sir. 11:35:14

12 Q. Did Sheriff Villanueva ever treat you any 11:35:15

13 differently because of your age? 11:35:17

14 A. No, sir. 11:35:20

15 Q. Did you ever observe Sheriff Villanueva 11:35:22

16 treating any women in the department differently than 11:35:24

17 he treated men? 11:35:27

18 A. No, sir. 11:35:29

19 Q. And did you -- excuse me. Did you -- and 11:35:30

20 just more pointedly, did you ever -- ever come across 11:35:32

21 a situation you believe Sheriff Villanueva engaged in 11:35:35

22 any type of harassment or discrimination because of 11:35:39

23 someone's gender? 11:35:42

24 A. No, sir. 11:35:43

25 Q. Did you ever watch any of Sheriff 11:35:55

1 Villanueva's Facebook Lives while he was a Sheriff? 11:35:58

2 A. Yes, sir. 11:36:02

3 Q. And did you ever hear him refer to Esther 11:36:03

4 Lim on any of those Facebook Lives? 11:36:07

5 A. I don't -- I can't tell you for sure. I 11:36:11

6 wouldn't recall if she -- he did or didn't. 11:36:14

7 Q. Did you ever hear Sheriff Villanueva refer 11:36:16

8 to Max Huntsman on any of those Facebook Lives? 11:36:19

9 A. He could have, but I don't recall. 11:36:24

10 Q. Did you ever hear -- sorry. Did you ever 11:36:27

11 listen to Sheriff Villanueva on KFI radio? 11:36:30

12 A. Yes, sir. 11:36:34

13 Q. And did you ever hear Sheriff Villanueva 11:36:36

14 refer to Esther Lim on any -- on KFI? 11:36:39

15 A. Not that I recall, sir. 11:36:45

16 Q. Did you ever hear Sheriff Villanueva refer 11:36:46

17 to Max Huntsman on KFI radio? 11:36:49

18 A. Not that I recall, sir. 11:36:53

19 Q. While Sheriff Villanueva was actually the 11:36:55

20 Sheriff, did you have any interactions with any of 11:36:57

21 the justice deputies of the Board of Supervisors? 11:37:00

22 A. Yes, sir. 11:37:04

23 Q. And what would -- which -- if you -- do you 11:37:05

24 recall any of the names of the justice deputies you 11:37:08

25 had interactions with? 11:37:11



1 A. Actually, the names -- I know Esther Lim. 11:37:12  
2 There was the one for Supervisor Barger, Supervisor 11:37:20  
3 Hahn, and then I don't think I ever acted very much 11:37:36  
4 with Supervisor Ridley Thomas, but the one that 11:37:38  
5 followed -- the one that followed her, I interacted 11:37:42  
6 with her justice deputy. I think actually with all 11:37:46  
7 of them to one point or another. 11:37:50  
8 Q. Did you ever interact with a woman named 11:37:51  
9 Kyla Coates? 11:37:56  
10 A. Yes, sir. 11:37:57  
11 Q. What would -- what was your interactions 11:37:58  
12 with Kyla Coates? 11:37:59  
13 A. Basically something that had to do with the 11:38:03  
14 problems of OIG and the civilian oversight committee 11:38:08  
15 and other things that had to do with the supervisors' 11:38:14  
16 cares within her district. 11:38:20  
17 Q. Did you ever take any action to make it more 11:38:23  
18 difficult for Kyla Coates to do her job? 11:38:26  
19 A. No, sir. We had a -- a good relationship. 11:38:30  
20 Q. And did Sheriff Villanueva ever instruct you 11:38:32  
21 to do not cooperate with Kyla Coates in any manner? 11:38:35  
22 A. No, sir. 11:38:39  
23 Q. Did Sheriff Villanueva ever tell you to not 11:38:40  
24 cooperate with any justice deputy for whatever 11:38:43  
25 reason? 11:38:46

1	A. No, sir.	11:38:48
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2 Q. And had Sheriff Villanueva asked you to not 11:38:49

3 cooperate with justice deputies because of political 11:38:51

4 | disagreement with the Board of Supervisors, would you 11:38:56

5 have followed that instruction? 11:38:58

6 A. We would have had a discussion, but -- 11:39:00

7 | because even though -- my job was to maintain liaison 11:39:09

8 with the board. So I interacted with the justice 11:39:14

9 deputies and the board members -- and the supervisors 11:39:17

```
10 themselves on a regular basis. 11:39:20
```

11	O. Do -- and are you familiar with a woman by	11:39:24
----	---	----------

12	the name of Veronica Pawlowsk?	11:39:26
----	--------------------------------	----------

13	A. Yes, sir.	11:39:30
----	--------------	----------

14	O. And did you interact with her while Sheriff	11:39:30
----	--	----------

15	Villanueva was Sheriff?	11:39:34
----	-------------------------	----------

16	A. Yes, sir.	11:39:35
----	--------------	----------

17	O. And what were your interactions with her	11:39:36
----	---	----------

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18 | like? 11:39:37
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19	A. Good. They were cordial.	11:39:39
----	-----------------------------	----------

20 0. And did you ever do anything to make it more 11:39:41

21 difficult for Veronica Pawlowsk to do her job? 11:39:43

22	A. No, sir.	11:39:48
----	-------------	----------

23	Q. Did you ever instruct any of your	11:39:48
----	--------------------------------------	----------

24	subordinates to not cooperate with Ms. Pawlowsk in	11:39:50
----	--	----------

25 any way? 11:39:55

1	A. No, sir.	11:39:56
2	Q. More broadly, did you ever instruct any of	11:39:56
3	your subordinates to not cooperate with any justice	11:39:58
4	deputy in any way?	11:40:01
5	A. No, sir.	11:40:03
6	Q. And I know you know who Esther Lim is, and	11:40:04
7	you said you interacted with her, but what were your	11:40:06
8	interactions with her like?	11:40:09
9	A. They were professional.	11:40:12
10	Q. Did you ever take any action -- action to	11:40:14
11	make it more difficult for Esther Lim to do her job	11:40:16
12	as a justice deputy?	11:40:19
13	A. No, sir.	11:40:20
14	Q. And did you ever instruct any of your --	11:40:22
15	anybody that reported to you to make it more	11:40:25
16	difficult for her to do her job?	11:40:29
17	A. No, sir.	11:40:31
18	Q. And did you ever cease cooperating with	11:40:32
19	Esther Lim in the performance of her job duties	11:40:35
20	because of any perceived disagreement she may have	11:40:37
21	had with Sheriff Villanueva?	11:40:41
22	A. No, sir.	11:40:43
23	Q. Did Sheriff Villanueva ever tell you that he	11:40:45
24	wanted Esther Lim to be fired?	11:40:49
25	A. No, sir.	11:40:52

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1 Q. Did Sheriff -- are you aware of Sheriff 11:40:53  
2 Villanueva sending a letter to the board of 11:40:57  
3 supervisors regarding Esther Lim's tweets? 11:40:59  
4 A. Yes, sir. 11:41:04  
5 Q. Were you involved in the drafting of that 11:41:05  
6 letter in any way? 11:41:06  
7 A. I don't believe so, sir. 11:41:08  
8 Q. Did you, yourself, review Esther Lim's 11:41:10  
9 tweets? 11:41:13  
10 A. I believe I saw them, sir. 11:41:16  
11 Q. Do you have an opinion one way or another of 11:41:18  
12 whether they were appropriate or not? 11:41:20  
13 MR. NEACH: Object to the relevance. Calls 11:41:24  
14 for opinion of an nonexpert witness. 11:41:28  
15 THE WITNESS: Yeah, my -- my opinion would 11:41:31  
16 be that they're unprofessional and inappropriate. 11:41:32  
17 BY MR. DIBONA: 11:41:32  
18 Q. And why do you believe they were 11:41:37  
19 unprofessional or inappropriate? 11:41:39  
20 A. Basically -- basically she's exchanging 11:41:44  
21 disparaging remarks about the Sheriff with one of the 11:41:47  
22 members of the civilian oversight committee. 11:41:50  
23 Q. Any other reason other than that? 11:41:54  
24 A. I don't think so, sir. 11:41:58  
25 Q. By the way, did you have an understanding 11:42:00

1 that one of Esther Lim's job duties as a justice 11:42:01  
2 deputy was to maintain at least a professional 11:42:04  
3 relationship with the Sheriff's Department? 11:42:08  
4 A. Yes, sir. 11:42:11  
5 Q. Do you have an opinion one way or another if 11:42:11  
6 Esther Lim's tweets made it more difficult for her to 11:42:14  
7 maintain a professional relationship with the 11:42:17  
8 Sheriff's Department? 11:42:19  
9 MR. NEACH: Objection to relevance. 11:42:22  
10 THE WITNESS: Yes, sir. 11:42:24  
11 BY MR. DIBONA: 11:42:24  
12 Q. And what's your opinion? 11:42:25  
13 MR. NEACH: Same objection. 11:42:27  
14 THE WITNESS: There was -- 11:42:28  
15 BY MR. DIBONA: 11:42:28  
16 Q. You can go ahead. 11:42:31  
17 A. Okay. 11:42:32  
18 Q. You can let opposing counsel object, but, 11:42:33  
19 yeah, you can go ahead. 11:42:35  
20 A. There was definitely a violation of trust, 11:42:37  
21 and we -- I believe that she showed a bias against 11:42:44  
22 the department and the Sheriff himself. 11:42:46  
23 Q. And did you, yourself -- excuse me. 11:42:52  
24 That violation of trust, did it have 11:42:55  
25 anything to do with the fact Esther Lim is a woman? 11:42:57

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1 saying, no, it was only me and him. You're just 11:44:08  
2 not aware, or you just don't remember who else was 11:44:11  
3 there, if anyone. 11:44:13  
4 Is that fair to say? 11:44:14  
5 A. Yes, sir. 11:44:15  
6 Q. Did Mark Lillienfeld ever tell you the 11:44:16  
7 basis -- or, sorry, excuse me. 11:44:20  
8 Did Mark Lillienfeld ever give you any 11:44:23  
9 details about the information he came across that Max 11:44:25  
10 Huntsman was a Holocaust denier? 11:44:29  
11 A. No, sir. 11:44:32  
12 Q. Did Mark Huntsman ever mention Max -- that 11:44:33  
13 Max Huntsman was Jewish? 11:44:37  
14 A. I'm not sure if I heard it from Detective 11:44:41  
15 Lillienfeld, but I do recall at some point in time 11:44:48  
16 somebody might have mentioned that he was part -- 11:44:51  
17 either -- might have been part Jewish possibly, but I 11:44:53  
18 couldn't tell you for sure, and now I can't tell you 11:44:57  
19 whether I read it in the newspaper. 11:44:59  
20 Q. Did Mark Lillienfeld ever mention that Max 11:45:02  
21 Huntsman's father was born in Germany? 11:45:07  
22 A. I believe so, sir. 11:45:12  
23 Q. And excuse me. 11:45:14  
24 Are you aware of any news reports about Mark 11:45:16  
25 Lillienfeld being placed on a do-not-rehire list or 11:45:25

1 having a do-not-rehire notation placed in his file? 11:45:28

2 A. I believe so, sir. 11:45:32

3 Q. Other than what you read in the media, do 11:45:35

4 you have any personal knowledge of why he was placed 11:45:37

5 on a do-not -- sorry, why he had a do-not-rehire 11:45:39

6 notation placed on his file? 11:45:43

7 A. No, sir. 11:45:45

8 Q. And what -- do you have an opinion one way 11:45:48

9 or the other of Mark Lillienfeld as a detective? 11:45:51

10 A. He is a very smart and hard-working 11:45:53

11 investigator, and he's well known for his skills to 11:45:58

12 the point where actually he was -- he worked with the 11:46:03

13 DA, LA County DA in the -- I guess people that were 11:46:07

14 falsely accused of crimes, he actually helped them 11:46:13

15 with those investigations. 11:46:18

16 Q. And do -- is it fair to say you have a high 11:46:19

17 opinion of his skills as a detective? 11:46:21

18 Sorry, sir. Did you hear the question? It 11:46:34

19 seems like you might have a technical issue. I'm 11:46:36

20 sorry. Did you hear my question? 11:46:38

21 A. Right now I just -- the volume kind of went 11:46:40

22 kind of low. 11:46:43

23 Q. Okay. That's fine. I'll just repeat it. 11:46:44

24 My question was is it fair to say you have a 11:46:46

25 high opinion of Mark Lillienfeld's skills as a 11:46:49

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1 detective? 11:46:52

2 A. Yes, sir. 11:46:53

3 Q. And is that -- at the -- around the time 11:46:55

4 that he told you Max Huntsman denied the Holocaust or 11:46:58

5 he had information that he did, did you have high 11:47:02

6 opinion of his detective skills then? 11:47:05

7 A. Yes, sir. 11:47:07

8 Q. Did you have any reason to disbelieve Mark 11:47:07

9 Lillienfeld when he had told you that information? 11:47:10

10 A. No, sir. 11:47:14

11 Q. Have you ever known Mark Huntsman to 11:47:15

12 fabricate information as a detective? 11:47:18

13 A. I think you mean Mark Lillienfeld, but, no, 11:47:22

14 sir. 11:47:26

15 Q. Sorry. Have you -- just so we have a clear 11:47:26

16 record. 11:47:28

17 Have you ever known Mark Lillienfeld to 11:47:29

18 fabricate information as a detective? 11:47:36

19 A. No, sir. 11:47:37

20 Q. Have you ever known Mark Lillienfeld to be 11:47:37

21 dishonest? 11:47:40

22 A. No, sir. 11:47:41

23 Q. Did you ever ask Mark Lillienfeld to lie? 11:47:41

24 A. No, sir. 11:47:46

25 Q. Did you -- earlier did you ever ask Mark 11:47:47

1 Lillienfeld -- 11:47:50

2 THE COURT REPORTER: I'm sorry. Could you 11:47:55

3 repeat the question? It broke up for a second. 11:47:56

4 BY MR. DIBONA: 11:47:56

5 Q. Did you ever ask Mark Lillienfeld to dig up 11:47:58

6 dirt on Max Huntsman? 11:48:01

7 A. No, sir. 11:48:03

8 Q. Did Sheriff Villanueva ever ask you to dig 11:48:06

9 up dirt on Max Huntsman? 11:48:08

10 A. No, sir. 11:48:10

11 Q. If Sheriff Villanueva had asked you to find 11:48:11

12 some dirt on Max Huntsman, what would your response 11:48:13

13 have been? 11:48:17

14 A. It -- I need clarification on what's meant 11:48:19

15 by "dirt," and what will be the purpose. 11:48:26

16 Q. Would -- if Sheriff Villanueva ever asked 11:48:33

17 you to find out something -- to make up something 11:48:35

18 that wasn't true about Max Huntsman, would you have 11:48:37

19 instructed your detectives to do that? 11:48:40

20 A. No, sir. 11:48:42

21 MR. NEACH: Object -- excuse me, lacks 11:48:43

22 foundation. Incomplete hypothetical. 11:48:45

23 BY MR. DIBONA: 11:48:45

24 Q. Did Sheriff Villanueva ever ask you to dig 11:48:49

25 up any dirt on Esther Lim? 11:48:51

1           A.   Again, if you are looking at, like, dirt,           11:48:55  
2   like, things against her character or -- or stuff           11:49:03  
3   like that, I don't -- unless I have some kind of           11:49:07  
4   purpose for the investigation, the answer would be           11:49:12  
5   no.           11:49:14  
6           Q.   Did Sheriff Villanueva ever ask you to open           11:49:15  
7   an investigation into Esther Lim of any kind?           11:49:17  
8           A.   No, sir.           11:49:20  
9           Q.   And as part of your career in law           11:49:24  
10   enforcement, do you have an understanding that law           11:49:26  
11   enforcement can need either probable cause or           11:49:28  
12   reasonable suspicion, depending on the circumstances,           11:49:29  
13   to open a criminal investigation?           11:49:33  
14           A.   Yes, sir.           11:49:36  
15           Q.   And would you ever investigate a criminal           11:49:37  
16   investigation with -- sorry.           11:49:39  
17                While you were at the Sheriff's Department,           11:49:41  
18   would you ever have investigated -- sorry.   Let me           11:49:43  
19   start over again.           11:49:46  
20                While you were at the Sheriff's Department,           11:49:47  
21   would you ever open a criminal investigation without           11:49:49  
22   a legal basis to do so?           11:49:52  
23           A.   No, sir.           11:49:56  
24           Q.   And would -- and did Sheriff Villanueva ever           11:49:57  
25   ask you to open a criminal investigation without a           11:50:00

1 legal basis to do so? 11:50:03

2 A. No, sir. 11:50:05

3 Q. And would you have opened a criminal 11:50:06

4 investigation if Sheriff Villanueva asked you to do 11:50:10

5 it if there wasn't the proper predication or legal 11:50:12

6 basis to do it? 11:50:15

7 MR. NEACH: Object. Lacks foundation. 11:50:17

8 Incomplete hypothetical. 11:50:18

9 You can answer. 11:50:20

10 THE WITNESS: No, sir. 11:50:21

11 BY MR. DIBONA: 11:50:21

12 Q. Did anyone ever ask to -- sorry, excuse me. 11:50:23

13 Other than this deposition, did anyone ever 11:50:26

14 ask -- interview you about Esther Lim or Max 11:50:29

15 Huntsman's complaints? 11:50:34

16 A. No, sir. 11:50:36

17 Q. Did anyone, to your knowledge, ever reach 11:50:36

18 out to you about -- about interviewing you regarding 11:50:39

19 Max Huntsman or Esther Lim's complaints? 11:50:42

20 A. No, sir. 11:50:45

21 Q. And did anyone ever reach out to you about 11:50:46

22 interviewing Sheriff Villanueva? 11:50:49

23 A. No, sir. 11:50:53

24 Q. While you were the Assistant Sheriff under 11:50:54

25 Sheriff Villanueva, if someone had wanted to 11:50:58

# EXHIBIT 29

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

3

4 ALEX VILLANUEVA, )

5 Plaintiff, )

6 )

7 VS. ) Case No.: 2:24-cv-04979  
SVW (JCx)

8 COUNTY OF LOS ANGELES, COUNTY )

9 OF LOS ANGELES SHERIFF'S )

10 DEPARTMENT, LOS ANGELES COUNTY )

BOARD OF SUPERVISORS, COUNTY )

11 EQUITY OVERSIGHT PANEL, LOS )

ANGELES COUNTY OFFICE OF )

12 INSPECTOR GENERAL, CONSTANCE )

KOMOROSKI, MERCEDES CRUZ, )

13 ROBERTA YANG, LAURA LECRIVAIN, )

SERGIO V. ESCOBEDO, RON )

14 KOPPERUD, ROBERT G. LUNA, )

MAX-GUSTAF HUNTSMAN, ESTHER )

15 LIM, and DOES 1 to 100, )

inclusive, )

16 )

Defendants. )

17 )

18 ,

19 DEPOSITION OF:

20 SERGIO V. ESCOBEDO

21 CONDUCTED VIA VIDEOCONFERENCE

22 Friday, March 14, 2025

23

24

25 REPORTED BY:

Kyle Miller

CSR No. 13282

17

Deposition of Sergio V. Escobedo, Volume 1, taken  
on behalf of the Plaintiff, before Kyle Miller,  
Certified Shorthand Reporter No. 13282 and Registered  
Professional Reporter for the State of California,  
commencing on Friday, March 14, 2025, via  
videoconference, beginning at 10:06 a.m. and ending at  
2:04 p.m.

1 APPEARANCES OF COUNSEL:

2

3 FOR THE PLAINTIFF:

4 SHEGERIAN & ASSOCIATES, INC.  
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7

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Los Angeles, California 90067  
12 (310) 552-4400  
jtokoro@millerbardondess.com  
13

14 ALSO PRESENT:  
15

16 Alex Villanueva  
17  
18  
19  
20  
21  
22  
23  
24  
25



1 relations to any incidents occurring within the  
2 County of Los Angeles that they may need to be aware of.

3 Q. And you said it was -- excuse me.

4 Is it fair you got promoted to this position  
5 in approximately December of 2024, just a few months  
6 ago; is that right?

7 A. Officially December 9, 2024, I was promoted  
8 to acting chief, but I was in the office a month prior  
9 as an on-loan position.

10 Q. And who made the decision to promote you?

11 A. Sheriff Luna.

12 Q. Uh-huh.

13 Did you have to interview to be promoted, or  
14 was that simply something that you were told you were  
15 going to be promoted to?

16 A. I was recommended to the position by the  
17 former chief of staff. And so the month I was on loan  
18 was essentially my trial basis, and the sheriff promoted  
19 me --

20 Q. And then --

21 A. -- based on my performance.

22 Q. -- who was the former chief of staff that  
23 recommended you?

24 A. Now-Assistant Sheriff Jason Skeen.

25 Q. What is your understanding of the role of

1 Q. All right. So do you have a recollection one  
2 way or another if either Mr. Huntsman or Ms. Lim  
3 received notification that there was a --  
4 Sheriff Villanueva violated department policy?

5 MR. TOKORO: Objection. Lacks foundation and calls  
6 for speculation, given his prior testimony.

7 But you can answer.

8 THE WITNESS: I don't recall.

9 BY MR. DIBONA:

10 Q. Do you see here the words, "You should be  
11 aware that Alex Villanueva has the right to grieve  
12 and/or otherwise appeal this recommended determination"?

13 MR. TOKORO: Document speaks for itself. No need  
14 to ask the witness to confirm what the document says.

15 But you can answer.

16 THE WITNESS: I do see that.

17 BY MR. DIBONA:

18 Q. And is it your understanding that  
19 Alex Villanueva did have the right to appeal the  
20 CEO's -- sorry -- the CEOP's recommendation that he have  
21 a "do not rehire" notation on top of his file?

22 A. He would not have a right for grievance.

23 Q. Uh-huh.

24 And Ron Kopperud is the person who signed  
25 this; correct?

1           A.     It's his name under the title, originally  
2 signed. I don't know if he signed it or not. That's --  
3 I'd have to see a signed letter.

4           Q.     And do you have a -- fair to say, did  
5 Ron Kopperud -- or "Kopperud" -- ever show you this  
6 letter before he sent it?

7           A.     Not that I recall.

8           Q.     And do you have any explanation for why  
9 there's a letter signed by one of your reports that  
10 incorrectly says Alex Villanueva has a right to grieve  
11 or appeal?

12          A.     No.

13          THE REPORTER: And that was Exhibit 5, for the  
14 record.

15          MR. DIBONA: Yes, it was.

16                               (Exhibit 5 marked)

17 BY MR. DIBONA:

18          Q.     All right. And, sir, for the purposes of  
19 sending a subpoena only, can you please put your  
20 residential address on the record.

21          MR. TOKORO: Same objection as with all the other  
22 depositions. That's private information. I'm  
23 instructing the witness not to answer.

24                   I know your position. You know ours. Happy  
25 to meet and confer and also happy to discuss further off

1

2 I, Kyle Miller, CSR No. 13282, certify:

3 That the foregoing proceedings were taken

4 before me at the time and place herein set forth; that

5 prior to testifying, the deponent was placed under oath;

6 that a verbatim record of the proceedings was made by me

7 using machine shorthand which was thereafter transcribed

8 under my direction; further, that the foregoing is an

9 accurate transcription thereof.

10 The deponent's review, correction, and

11 signing of the transcript was requested.

12 The dismantling, unsealing, or unbinding of

13 the original or certified transcript will render the

14 reporter's certificate null and void.

15 I further certify that I am not financially

16 interested in the action and that I am not a relative

17 nor an employee of any attorney or party to this action.

18

19 Dated this 31st day of March, 2025.

20

21



22

---

23 Kyle Miller  
CSR NO. 13282

24

25

# EXHIBIT 30

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX VILLANUEVA, )  
PLAINTIFF, ) CASE NO.  
VS. ) 2:24-cv-04979  
COUNTY OF LOS ANGELES, COUNTY ) SVW (JCx)  
OF LOS ANGELES SHERIFF'S )  
DEPARTMENT, LOS ANGELES COUNTY )  
BOARD OF SUPERVISORS, COUNTY )  
EQUITY OVERSIGHT PANEL, )  
LOS ANGELES COUNTY OFFICE OF )  
INSPECTOR GENERAL, CONSTANCE )  
KOMOROSKI, MERCEDES CRUZ, )  
ROBERT A. YANG, LAURA LECRIVAIN, )  
SERGIO V. ESCOBEDO, RON )  
KOPPERUD, ROBERT G. LUNA, )  
MAX-GUSTAF HUNTSMAN, ESTHER LIM, )  
AND DOES 1 TO 100, INCLUSIVE, )  
DEFENDANTS. )

VIDEOTAPED DEPOSITION OF MARK LILLIENFELD

MONDAY, APRIL 14, 2024

REPORTED BY  
KIMBERLY EDELEN, CSR. NO. 9042, CRR, RPR.  
JOB NO. 7246491  
PAGES 1 - 72

1 VIDEOTAPED DEPOSITION OF MARK LILLIENFELD, TAKEN  
2 ON BEHALF OF THE DEFENDANTS, AT 10:01 A.M. PDT,  
3 MONDAY, APRIL 14, 2024, AT 2121 AVENUE OF THE STARS,  
4 SUITE 2600, LOS ANGELES, CALIFORNIA, BEFORE  
5 KIMBERLY A. EDELEN, CSR NO. 9042, CRR, RPR.

6  
7 APPEARANCES OF COUNSEL

8  
9 FOR THE PLAINTIFF:

10 SHEGERIAN & ASSOCIATES  
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15

16 FOR THE DEFENDANTS:

17 MILLER BARONDESS, LLP  
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22 310.552.4400  
23 BNEACH@MILLERBARONDESS.COM  
24

25 ALSO PRESENT: TRISTAN KNUDSEN, VIDEOGRAPHER

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I N D E X

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## E X H I B I T S

NO.	PAGE	DESCRIPTION
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EXHIBIT 1	11	DEFENDANT COUNTY OF LOS ANGELES AMENDED NOTICE OF SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION TO MARK LILLIENFELD
EXHIBIT 2	52	ARTICLE TITLED "SHERIFF HIRES CORRUPTION INVESTIGATOR ACCUSED OF POSING AS DEPUTY"

## REFERENCED EXHIBITS PREVIOUSLY MARKED

NO.	DESCRIPTION
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EXHIBIT 20	ARTICLE TITLED "THE VILLANUEVA SAGA GETS ODDER AND MORE DESTRUCTIVE"
EXHIBIT 27	ARTICLE TITLED "DETECTIVE ACCUSED OF GIVING NAZI-LIKE SALUTE RESIGNS FROM SOUTH PASADENA POLICE DEPARTMENT"

LOS ANGELES, CALIFORNIA; MONDAY, APRIL 14, 2024;

10:01 A.M. PDT

THE VIDEOGRAPHER: Good morning. We're  
going on the record at 10:01 a.m. on the 14th of  
April 2025.

Please note the microphones are sensitive  
and may pick up whispering and private  
conversations. Please mute your phones at this  
time.

Audio and video recording will continue to  
take place unless all parties agree to go off the  
record.

This is Media Unit No. 1 of the  
video-recorded deposition of Mark Lillienfeld taken  
by counsel for defendant in the matter of  
Alex Villanueva versus County of Los Angeles,  
et al., filed in the United States District Court,  
Central District of California, Western Division,  
Case No. 2:24-cv-04979 SVW (JCx).

The location of this deposition is  
Miller Barondess, LLP, 2121 Avenue of the Stars,  
Suite 2600, Los Angeles, California 90067.

My name is Tristan Knudsen representing

Page 5

1 Veritext Legal Solutions, and I'm the videographer 10:02:46  
2 today. I am not related to any party in this action 10:02:49  
3 nor am I financially interested in the outcome. 10:02:51  
4 If there are any objections -- if there are 10:02:55  
5 any objections to proceeding, please state them at 10:02:57  
6 the time of your appearance. 10:03:00  
7 Counsel and all present will now state 10:03:01  
8 their appearances and affiliations for the record 10:03:03  
9 beginning with the noticing attorney, please. 10:03:05  
10 MR. NEACH: Good morning. Brian Neach of 10:03:08  
11 Miller Barondess, LLP representing the defendants in 10:03:10  
12 this case. 10:03:13  
13 MR. DI BONA: Good morning. Alex DiBona of 10:03:14  
14 Shegerian & Associates on behalf of the plaintiff 10:03:17  
15 Alex Villanueva. 10:03:19  
16 THE VIDEOGRAPHER: Thank you. 10:03:22  
17 Will the court reporter please introduce 10:03:23  
18 herself and swear in the witness. 10:03:24  
19 THE REPORTER: Pursuant to Business and 10:03:27  
20 Professions Code 8016(b)(1) and (2), my name is 10:03:27  
21 Kim Edelen and my CSR number is 9042. 10:03:27  
22 Would you raise your right hand, please. 10:03:35  
23 You do solemnly swear the testimony you're 10:03:40  
24 about to give shall be the truth, the whole truth 10:03:40  
25 and nothing but the truth? 10:03:40

1 THE WITNESS: I do. 10:03:41

2 THE REPORTER: Thank you. 10:03:42

3

4 EXAMINATION

5 BY MR. NEACH:

6 Q Good morning, sir. 10:03:44

7 A Good morning. 10:03:45

8 Q If you wouldn't mind, if you could state 10:03:45

9 your name and spell it for the court reporter. 10:03:48

10 A Mark Lillienfeld, M-a-r-k, 10:03:51

11 L-i-l-l-i-e-n-f-e-l-d. 10:03:52

12 Q All right. Have you had your deposition 10:03:57

13 taken before? 10:04:04

14 A Yes, sir. 10:04:05

15 Q Okay. How many times, do you think? 10:04:05

16 A 30. 10:04:07

17 Q 30. 10:04:07

18 Okay. So I'm going to spare you going over 10:04:08

19 all of the basic ground rules, but you understand 10:04:09

20 you're testifying under oath, correct? 10:04:11

21 A I do. 10:04:13

22 Q Okay. And then just let me finish my 10:04:14

23 question, and I'll let you finish your answer so we 10:04:15

24 get a clean record. 10:04:18

25 Does that make sense? 10:04:20

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1	A	It does.	10:04:21
2	Q	Okay. Are there any health issue or	10:04:21
3		concerns that are requiring you to take any	10:04:24
4		medication that might impact your memory at all?	10:04:27
5	A	No.	10:04:29
6	Q	Okay. Any reason why you can't give your	10:04:29
7		best testimony today?	10:04:31
8	A	No.	10:04:32
9	Q	Okay. When was the last time you had your	10:04:32
10		deposition taken?	10:04:36
11	A	2022.	10:04:42
12	Q	Okay. Do you recall what case that was?	10:04:43
13	A	I do not.	10:04:47
14	Q	Okay. Was it -- did it grow out of your	10:04:48
15		work with the Sheriff's Department?	10:04:52
16	A	Yes.	10:04:54
17	Q	Okay. Were you a party or were you just a	10:04:54
18		witness?	10:04:57
19	A	Witness.	10:04:58
20	Q	You don't recall who the parties were?	10:04:59
21	A	I do not.	10:05:01
22	Q	Are you currently a party in any lawsuit,	10:05:05
23		plaintiff or defendant?	10:05:09
24	A	I am not.	10:05:10
25	Q	Have you ever been a plaintiff or defendant	10:05:12

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1 in a lawsuit? 10:05:13

2 A No. 10:05:14

3 Q Okay. I -- I'm guessing, but I guess a 10:05:15

4 pretty educated guess, have you testified in court 10:05:24

5 before? 10:05:27

6 A I have. 10:05:27

7 Q How many times? 10:05:29

8 A 300. 10:05:36

9 Q Yeah. 10:05:37

10 And those are -- most of those are -- were 10:05:39

11 all of those in connection with when you were 10:05:42

12 serving at the Sheriff's Department? 10:05:43

13 A Yes. 10:05:44

14 Q Okay. Have you had phone conversations 10:05:45

15 with Mr. DiBona, who's sitting next to you? 10:05:50

16 A Yes. 10:05:53

17 Q How many times -- when is the last time you 10:05:54

18 talked to him on the phone? 10:05:55

19 A I believe a week before last. 10:05:56

20 Q Okay. How long was that conversation? 10:05:58

21 A About three minutes. 10:06:00

22 Q Okay. Is this the first time you met him 10:06:01

23 in person? 10:06:05

24 A It is. 10:06:06

25 Q Okay. What was the substance of your 10:06:06

1 three-minute phone call, if you recall? 10:06:09

2 A The fact that I was not represented by 10:06:15

3 counsel during this deposition. 10:06:19

4 Q Okay. And what did he tell you in 10:06:20

5 connection with that? 10:06:26

6 A That I could hire my own counsel. 10:06:27

7 Q Uh-huh. 10:06:29

8 Did you do anything to prepare for the 10:06:36

9 deposition today? 10:06:38

10 A I've thought about it. 10:06:43

11 Q Did you look at any documents? 10:06:44

12 A I am not in possession of any documents. 10:06:47

13 Q Okay. Did you speak to anybody about your 10:06:48

14 deposition? 10:06:57

15 A I spoke to, I believe, an associate of 10:07:00

16 yours named Jason Tokoro. 10:07:02

17 Q Uh-huh. 10:07:06

18 A And I spoke to a gentleman from County 10:07:06

19 Counsel who's last name is Bavafa, B-a-v-a-f-a, 10:07:08

20 I believe. 10:07:14

21 Q Okay. 10:07:16

22 A I might be wrong in that spelling and 10:07:17

23 pronunciation. 10:07:18

24 Q Okay. And that conversation was to see if 10:07:19

25 they would represent you in this deposition? 10:07:22

1	A	Yes.	10:07:25
2	Q	And they said they would not?	10:07:26
3	A	Correct.	10:07:27
4		MR. NEACH: I'm going to mark as	10:07:33
5		Exhibit 1...	10:07:34
6		(Deposition Exhibit 1	10:07:58
7		was marked for identification.)	10:07:58
8		MR. NEACH: I guess I made more copies than	10:08:00
9		I needed. Thank you.	10:08:02
10		BY MR. NEACH:	10:08:06
11	Q	So what I've put in front of you, sir, as	10:08:07
12		Exhibit 1 is -- it's a caption page, "Defendant	10:08:09
13		County of Los Angeles' Amended Notice of Subpoena to	10:08:14
14		Testify at a Deposition in a Civil Action to	10:08:18
15		Mark Lillienfeld."	10:08:21
16		Do you recognize this document?	10:08:23
17	A	I do.	10:08:24
18	Q	Okay. You were served this by Mr. Tokoro?	10:08:25
19	A	By his representative, yes. And thank you	10:08:30
20		and thank him for taking my home address off of it.	10:08:32
21	Q	You're welcome. Good.	10:08:36
22		At the bottom, there's some numbered pages,	10:08:42
23		like, "Exhibit 1," if you go to the next few pages.	10:08:44
24	A	Yes.	10:08:49
25	Q	Go to the one that says "Exhibit 1 -	10:08:49



1 Page 9." 10:08:51

2 A You know what, I go from Page 8 to Page 12 10:08:56

3 in this exhibit. 10:08:59

4 Q All right. 10:09:01

5 A Yes, sir. 10:09:04

6 Q Oh, oh, oh. Let me see. I meant at the 10:09:08

7 bottom. It says -- at the very bottom, it says 10:09:14

8 "Exhibit 1 - Page 9." 10:09:16

9 But over -- 10:09:21

10 A Oh, I'm sorry. Yes, I see that. My -- my 10:09:22

11 bad. 10:09:24

12 Q No problem. No problem. 10:09:25

13 I think you've already kind of answered 10:09:26

14 this question, but I've just got to go through it. 10:09:28

15 So there's several document requests. Did 10:09:30

16 you look through these requests at all? 10:09:32

17 A Yes, sir, I did. 10:09:35

18 Q Okay. And did you check anything or -- 10:09:35

19 whether it be a computer or any paper files to see 10:09:38

20 if you had any documents that might be responsive? 10:09:40

21 A I did not because I didn't have to because 10:09:42

22 I knew that I was not in possession of any of the 10:09:44

23 documents that you're requesting here. 10:09:46

24 Q Okay. So it's just you know that you don't 10:09:47

25 retain on your computer any documents related to 10:09:51

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1 your employment with the L.A. Sheriff? 10:09:54

2 A That is correct. 10:09:57

3 Q Okay. And you don't retain any paper 10:09:57

4 files? 10:10:00

5 A That is correct. 10:10:00

6 Q Okay. So you didn't bother looking for 10:10:01

7 something you knew you didn't have, right? 10:10:07

8 A That is correct. 10:10:09

9 Q Okay. If you don't mind if you just tell 10:10:10

10 me what your educational background is, starting 10:10:24

11 with high school. 10:10:26

12 A A high school grad, I've got about three 10:10:27

13 and a half years of college. 10:10:30

14 Q Okay. Where was that? 10:10:32

15 A Western Illinois University, Los Angeles 10:10:34

16 Valley College and California State University, 10:10:37

17 Los Angeles. 10:10:38

18 Q Okay. Do you have any certifications? 10:10:42

19 A I have a basic, an intermediate and 10:10:46

20 advanced POST certificates. 10:10:50

21 Q And what are those in relation to? 10:10:53

22 A My employment as a peace officer. 10:10:55

23 Q In the deposition testimony that you 10:11:08

24 recently gave, do you remember what the substance of 10:11:09

25 it was? 10:11:12

1	A	I'm sorry, I don't.	10:11:13
2	Q	Okay. And then do you remember when you	10:11:15
3		got deposed before that?	10:11:18
4	A	Probably around -- oh, you know, during	10:11:21
5		COVID.	10:11:25
6	Q	Okay. Do you recall what that case was?	10:11:25
7	A	I do not.	10:11:28
8	Q	Okay. Let's see.	10:11:28
9		Well, I know you worked at the Sheriff's	10:11:40
10		Department. So before you started work -- well,	10:11:43
11		when did you start working at the Sheriff's	10:11:45
12		Department?	10:11:47
13	A	December 18th, 1980.	10:11:48
14	Q	Okay. And was that started as training?	10:11:55
15	A	Yes.	10:11:58
16	Q	Okay. And did that last, what, like	10:11:59
17		roughly six months?	10:12:02
18	A	The academy is about four months long.	10:12:03
19	Q	And then where did you go after training?	10:12:07
20	A	Inmate Reception Center, Custody Division.	10:12:13
21		(Clarification by the Reporter.)	10:12:16
22	BY MR. NEACH:		10:12:16
23	Q	How long were you there?	10:12:18
24	A	One year, one week and six days.	10:12:19
25	Q	Okay. And after that, sir?	10:12:25

1 A I went to patrol. 10:12:26

2 Q Which station? 10:12:27

3 A Firestone. 10:12:29

4 Q Which one was that? 10:12:30

5 A Firestone. It no longer exists. 10:12:31

6 Q I was going to say... 10:12:34

7 How long were you at the Firestone station? 10:12:35

8 A About five years. 10:12:40

9 Q Okay. That gets us to roughly 1986 or so? 10:12:41

10 A Roughly, yes. 10:12:48

11 Q And then after being patrol at Firestone, 10:12:49

12 what did you do? 10:12:51

13 A I was a detective at Firestone also during 10:12:52

14 that time period. 10:12:55

15 Q Oh, okay. 10:12:55

16 During that five-year period? 10:12:58

17 A Yes, sir. 10:12:59

18 Q Okay. Did that involve a promotion? 10:13:00

19 A Yes. 10:13:03

20 Q Okay. What was the promotion? 10:13:04

21 A Detective is both a rank and an assignment 10:13:06

22 on the Sheriff's Department. 10:13:09

23 Q Okay. And then after Firestone station, 10:13:10

24 what did you do? 10:13:15

25 A I worked out of the Office of the Sheriff 10:13:16

1 very briefly conducting criminal investigations. 10:13:19

2 Q Okay. "Briefly," less than a year? 10:13:21

3 A Yes. 10:13:24

4 Q Okay. And then after that? 10:13:24

5 A I was a detective very briefly for about 10:13:29

6 three months in the Forgery Fraud Division. 10:13:31

7 Q Okay. I have a feeling there's going to be 10:13:39

8 quite a few movements by you. 10:13:43

9 After that, sir, what did you do? 10:13:45

10 A I was a detective in what was then called 10:13:47

11 the Special Investigations Bureau, prison gang 10:13:50

12 section. 10:13:56

13 Q And how long were you in that role? 10:13:58

14 A About three years. 10:14:03

15 Q What does that division refer to now or 10:14:06

16 does it no longer exist? 10:14:08

17 A That -- that bureau is now called Major 10:14:10

18 Crimes Bureau. 10:14:13

19 Q Okay. And then after your three years 10:14:20

20 there what did you do? 10:14:22

21 A I promoted to another rank in the detective 10:14:25

22 classification and I went to Homicide Bureau. 10:14:29

23 Q Okay. How long were you there? 10:14:31

24 A 24 years, almost 25 years. 10:14:37

25 Q So that takes us to when in your timeline? 10:14:43

1 A August 10th, 2016. 10:14:46

2 Q That's a long time on homicide. 10:14:53

3 A Yes, sir. 10:14:55

4 Q Okay. So after the -- after August 10th, 10:15:00

5 2016, you leave Homicide Bureau and do what? 10:15:03

6 A Well, I was retired. I was hired 10:15:08

7 subsequent to that by the then-elected District 10:15:13

8 Attorney Jackie Lacey, and I worked as a civilian 10:15:17

9 contract investigator in what was then called the 10:15:21

10 Conviction Review Unit of the Appellate Division. 10:15:26

11 Q And generally what does that unit do? 10:15:37

12 A It reviews convictions that are 10:15:38

13 questionable or new evidence has come to light. It 10:15:44

14 is associated with the Habeas Litigation Unit, and 10:15:49

15 it investigates claims of innocence by convicted 10:15:53

16 people. 10:15:57

17 Q I see. 10:15:59

18 And was that a full-time position? 10:16:00

19 A It was at the time, yes. It was a contract 10:16:04

20 position but, yes. 10:16:06

21 Q Okay. So at that time, you were retired 10:16:07

22 from the Sheriff's Department, right? 10:16:15

23 A That is correct. 10:16:16

24 Q Okay. And how long did you do that? 10:16:23

25 A About a year and a half. 10:16:26

1 Q So then we get to, what, 2018? 10:16:31

2 A Roughly, yes. 10:16:36

3 Q Okay. And then what happens in your 10:16:38

4 career? 10:16:41

5 A In 2018, Alex Villanueva was elected 10:16:46

6 sheriff, and I had met him through a mutual friend. 10:16:50

7 And in 2019, I hired back on the Sheriff's 10:16:54

8 Department as a part-time detective, what they call 10:17:01

9 a 120-day employee, as those employees are limited 10:17:06

10 in the number of hours they can work per year 10:17:10

11 without affecting their pension. 10:17:14

12 Q I see. 10:17:16

13 And what was your position -- I guess -- 10:17:21

14 let me rephrase that. 10:17:25

15 You were hired on as a detective, right? 10:17:27

16 A Yes. 10:17:31

17 Q And what sort of things would you be 10:17:32

18 investigating? 10:17:35

19 A Allegations of public corruption. 10:17:37

20 Q Was this a new -- what would you call it? 10:17:48

21 Is it a task force or a -- what would you call it? 10:17:51

22 A I would not call it a task force. It was a 10:17:54

23 newly formed unit that I was assigned to help create 10:17:56

24 and manage. 10:18:06

25 Q Do you know how many members of the unit 10:18:11

1	there were?	10:18:13
2	A The highest number, I believe, was eight	10:18:15
3	detectives and a lieutenant.	10:18:18
4	Q And is this just one of the things you were	10:18:31
5	doing, or was this the only thing you were doing?	10:18:32
6	A That was primarily the only thing I was	10:18:35
7	doing.	10:18:36
8	Q And how much time was that taking?	10:18:37
9	A Again, it was -- you know, I was limited to	10:18:39
10	20 hours a week or 960 hours in a 12-month period,	10:18:42
11	so it varied. I mean, some weeks I would work 40 or	10:18:47
12	50 hours and then not work for a couple weeks. So	10:18:51
13	it varied so that I could fulfill those time	10:18:53
14	limitations.	10:18:56
15	Q Right.	10:18:56
16	Were you the head of this unit?	10:19:01
17	A I was not.	10:19:03
18	Q Who was the head of the unit?	10:19:04
19	A The lieutenant in charge of the unit.	10:19:06
20	Q And who was that?	10:19:09
21	A There were two of them. The first	10:19:10
22	lieutenant was Glenn Walsh. Glenn is G-l-e-n-n.	10:19:12
23	And the second lieutenant was Andy Myers. And Myers	10:19:21
24	is M-e-y-e-r-s.	10:19:27
25	Q So were you reporting to the lieutenants?	10:19:40

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1	A	Yes.	10:19:43
2	Q	Did you have direct reports to you?	10:19:45
3	A	I'm sorry?	10:19:48
4	Q	Did you have direct -- did you have people	10:19:49
5		directly reporting to you?	10:19:51
6	A	No. Not reporting to me, no.	10:19:52
7	Q	And then how long were you on this -- part	10:20:15
8		of this unit?	10:20:18
9	A	From July of 2019 until January of 202' --	10:20:20
10		give me one second -- '23.	10:20:33
11	Q	And why did you leave?	10:20:40
12	A	A new sheriff was elected and he disbanded	10:20:43
13		the unit. Because I was a hire-back employee, I was	10:20:45
14		an at-will employee, so he thanked me for my service	10:20:49
15		and told me it was no longer needed.	10:20:53
16	Q	Sheriff Luna?	10:20:56
17	A	That is correct.	10:20:58
18	Q	Uh-huh.	10:20:59
19		While you were a part of this unit, do you	10:21:00
20		recall any -- well, what did you call -- anybody who	10:21:07
21		was being investigated, what did you call them?	10:21:11
22		Subject?	10:21:13
23	A	No. If there was an allegation of criminal	10:21:15
24		conduct against a particular person, they're	10:21:18
25		suspects of a crime.	10:21:22

1 Q Okay. So what was the process? Was 10:21:23  
2 there -- would there be an intake for getting 10:21:31  
3 complaints about a particular kind of crime and it 10:21:34  
4 would get reported to your unit? 10:21:36  
5 A Yes. 10:21:38  
6 Q And it was related to public corruption 10:21:40  
7 specifically? 10:21:43  
8 A Yes. 10:21:43  
9 Q Do you recall any of the suspects that you 10:21:48  
10 investigated while you were there? 10:21:50  
11 A Yes. 10:21:53  
12 Q Which ones? 10:21:54  
13 A I apologize. A number of them, I can't 10:22:00  
14 identify by name. A number of them, I can't 10:22:04  
15 identify my name. 10:22:07  
16 There was a number of people in government 10:22:19  
17 who were accused of wrongdoing. One of them was an 10:22:21  
18 executive on the Sheriff's Department who had 10:22:26  
19 retired and he was accused of perjuring himself 10:22:28  
20 during a civil service hearing. 10:22:32  
21 And then there was a allegation of theft 10:22:34  
22 from a employee working for the City of Carson in 10:22:38  
23 the Maintenance Department, I believe. 10:22:43  
24 There was an allegation of wrongdoing -- 10:22:45  
25 criminal wrongdoing on the part of a firefighter 10:22:47

1 from a smaller incorporated city within Los Angeles 10:22:51  
2 County. I apologize. I don't even remember the 10:22:54  
3 city. It was somewhere in the San Gabriel Valley. 10:22:57  
4 And then there were other cases of 10:23:00  
5 wrongdoing, criminal wrongdoing, which is why we're 10:23:03  
6 here today, obviously, from the former 10:23:06  
7 constitutional police advisor, the inspector 10:23:10  
8 general, an L.A. Times reporter, another attorney, a 10:23:18  
9 deputy inspector general, and then a Sheriff's 10:23:23  
10 Department civilian employee that worked for the 10:23:27  
11 constitutional police advisor. 10:23:30  
12 And there were -- there were miscellaneous 10:23:32  
13 other criminal open active cases that were assigned 10:23:35  
14 to that unit that I didn't necessarily handle on a 10:23:42  
15 personal level but I was aware of them. 10:23:46  
16 Q Was Max Huntsman one of the ones that were 10:23:49  
17 investigated? 10:23:53  
18 A Yes. 10:23:53  
19 Q Okay. Did you have personal involvement in 10:23:54  
20 that? 10:23:55  
21 A Yes. 10:23:55  
22 Q Do you recall how that case came to your 10:23:56  
23 unit? 10:23:58  
24 A Yes. 10:23:59  
25 Q How did it come to your unit? 10:23:59

1	A A number of citizens and government	10:24:03
2	employees had complained to the then-candidate	10:24:09
3	Alex Villanueva regarding what they believed to be	10:24:14
4	criminal conduct.	10:24:19

5	I believe at some point in time after the	10:24:21
6	election and after Alex Villanueva was sworn in as	10:24:25
7	the sheriff of Los Angeles County, an audit was	10:24:27
8	conducted of databases containing personnel records,	10:24:32
9	and it was during that audit that it was revealed	10:24:39
10	that a large number of personnel records were	10:24:42
11	downloaded from a secured database onto a external	10:24:46
12	hard drive, I believe.	10:24:50

13	And so that -- because they were protected	10:24:52
14	under the Penal Code, that -- that audit initiated a	10:24:55
15	criminal investigation of the theft of these files.	10:25:02

16	Q And then what did you do to get that	10:25:09
17	investigation going, personally?	10:25:11

18	A I did a bunch of interviews, I collected as	10:25:13
19	much evidence as I could that was available, and,	10:25:17
20	you know, went down the path to determine what, if	10:25:21
21	any, crime had occurred and what evidence would be	10:25:24
22	available to prove or disprove that the crime	10:25:27
23	occurred.	10:25:30

24	Q Do you know what the results of the	10:25:31
25	Huntsman was, specifically?	10:25:32

1	A	Yes.	10:25:36
2	Q	What was the result?	10:25:36
3	A	Mr. Huntsman would be a unindicted	10:25:41
4		co-conspirator in a case that is currently being	10:25:44
5		prosecuted by the Attorney General of California	10:25:48
6		under the notation or the heading of the People	10:25:51
7		versus Diana Marie Teran, T-e-r-a-n.	10:25:55
8	Q	So charges were filed against her, right?	10:26:03
9	A	That's correct.	10:26:06
10	Q	Were -- charges were not filed against	10:26:08
11		Mr. Huntsman, right?	10:26:10
12	A	That is correct.	10:26:11
13	Q	Had you provided any recommendation or	10:26:13
14		suggestion that there should be charges filed	10:26:15
15		against Mr. Huntsman?	10:26:17
16	A	I did not. I presented that case to the	10:26:18
17		California Attorney General, and subsequently those	10:26:21
18		charges were filed.	10:26:27
19	Q	When you say "those charges were filed,"	10:26:31
20		the ones against Ms. Teran, right?	10:26:32
21	A	That is correct.	10:26:37
22	Q	But not against Mr. Huntsman?	10:26:37
23	A	That is correct.	10:26:40
24	Q	How about Esther Lim, did you do any kind	10:26:40
25		of -- wait, I always get her name wrong.	10:26:43

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1 Do you know who Esther Lim is? 10:26:43

2 A I know the name. I don't know the woman, 10:26:45

3 and... 10:26:47

4 Q It is Esther, though, right? 10:26:48

5 A I believe so, yes. 10:26:50

6 Q I spent a deposition calling her Edith Lim 10:26:51

7 the whole time, so they kept reminding me. 10:26:55

8 So did you do any -- were you personally 10:26:57

9 involved in any investigation of her? 10:26:59

10 A I was not. 10:27:01

11 Q Okay. Are you aware of any sort of 10:27:01

12 complaint being filed with respect to her? 10:27:04

13 A I am not. 10:27:05

14 Q Okay. Have you met Max Huntsman in person? 10:27:06

15 A I never have. I have never shook his hand. 10:27:09

16 I've been in the same room with him. I've never 10:27:13

17 been introduced to him, no. 10:27:15

18 Q Is that the same for Esther Lim? 10:27:17

19 A Absolutely. 10:27:20

20 Actually, no. I've never -- I don't think 10:27:21

21 I've ever seen her in person even. 10:27:24

22 Q Okay. So getting back to -- you said you 10:27:26

23 met Mr. Villanueva through a friend. 10:27:44

24 Who was the friend? 10:27:47

25 A Attorney Michael Goldfeder, 10:27:51

1 G-o-l-d-f-e-d-e-r. 10:27:53

2 Q And so how did you -- well, how did that 10:28:00

3 come -- you already knew Mike Goldfeder? 10:28:03

4 A Yes. 10:28:06

5 Q Okay. And he introduced you to 10:28:06

6 Mr. Villanueva? 10:28:09

7 A That's correct. 10:28:09

8 Q Okay. You had not met -- your paths had 10:28:10

9 not -- what year was that? 10:28:15

10 A 2018. 10:28:17

11 Q By that time, was Mr. Villanueva already 10:28:22

12 elected as sheriff? 10:28:30

13 A He was not. 10:28:31

14 Q Had he announced that he was running, 10:28:34

15 though? 10:28:36

16 A He was a candidate, yes. 10:28:36

17 Q And do you know the purpose for your 10:28:40

18 introduction to Mr. Villanueva by Mr. Goldfeder? 10:28:42

19 A Yes. 10:28:45

20 Q What was the reason? 10:28:46

21 A To discuss the viability of hiring me back 10:28:48

22 on the Sheriff's Department as a part-time 10:28:55

23 detective. 10:28:57

24 Q Is Michael Goldfeder your personal 10:29:04

25 attorney? 10:29:06





1           A     In person was probably a couple of -- you           10:30:16  
2           know, about six months ago, I spoke to him briefly           10:30:24  
3           at a funeral service.           10:30:26  
4           Q     And then when is the last time you talked           10:30:39  
5           to him on the phone?           10:30:41  
6           A     I would guess at least a year or more.           10:30:46  
7           Q     Okay. Has he ever discussed this lawsuit           10:30:54  
8           with you?           10:30:55  
9           A     No.           10:30:56  
10          Q     Okay.           10:30:56  
11          A     I wasn't aware of this lawsuit until I was           10:30:58  
12          subpoenaed for it.           10:31:00  
13          Q     Okay. Did you do any work to figure out           10:31:01  
14          what's at issue in this case?           10:31:06  
15          A     Not a thing.           10:31:08  
16          Q     The less you know the better, right?           10:31:08  
17          A     No. I just -- it's not that I don't --           10:31:10  
18          I mean, I care. It's just I'm not a party to the           10:31:15  
19          suit, so the answer is no.           10:31:20  
20          Q     Okay. So when's the last time -- or have           10:31:26  
21          you ever got lunch or dinner with Mr. Villanueva?           10:31:29  
22          A     Never.           10:31:31  
23          Q     Has he ever invited you to a party?           10:31:34  
24          A     Yes. I believe it was a -- I believe it           10:31:41  
25          was a birthday celebration. And it was at a           10:31:47

1 restaurant/bar in East Los Angeles on Olympic. And 10:31:51  
2 I attended that, and that was about -- that had to 10:32:03  
3 be around 2019 or something. 10:32:07  
4 Q Okay. Do you know his family? 10:32:08  
5 A I've met his wife a couple of times. 10:32:14  
6 I cannot remember her first name, to be honest with 10:32:19  
7 you. 10:32:22  
8 Q Okay. 10:32:22  
9 A Vivian. 10:32:25  
10 Q Nice. Well done. 10:32:27  
11 Do you exchange text messages with 10:32:34  
12 Mr. Villanueva? 10:32:36  
13 A Not now, no. I did during the course and 10:32:37  
14 scope of my employment when I was working as a 10:32:40  
15 deputy sheriff and I had a County cell phone, yes. 10:32:42  
16 Q You don't have that cell phone anymore? 10:32:46  
17 A I do not. 10:32:48  
18 Q Do you know John Satterfield? 10:32:57  
19 A Yes. 10:33:00  
20 Q When's the last time you talked to 10:33:01  
21 John Satterfield? 10:33:03  
22 A Before the election of Robert Luna which 10:33:09  
23 was in, I believe, November of -- again, my 10:33:14  
24 apologies, November of '23. So it was before that, 10:33:16  
25 the last time I spoke with him. 10:33:20

1 Q Then how about Tim Murakami, 10:33:35  
2 M-u-r-a-k-a-m-i, have you talked to him in the past? 10:33:39  
3 A I spoke to him about five or six months 10:33:44  
4 ago. 10:33:47  
5 Q What was the substance of that discussion? 10:33:49  
6 A That's a great question. And it was not 10:33:52  
7 work-related. It was -- I want to say it had to do 10:33:54  
8 with Hawaii. 10:33:59  
9 Q Okay. 10:34:00  
10 A And I really -- I really don't recall. 10:34:00  
11 Q Okay. It didn't have anything to do with 10:34:03  
12 this lawsuit? 10:34:07  
13 A No. 10:34:07  
14 I think I can add to that, which of course 10:34:14  
15 I shouldn't, but I will. I believe he and I texted 10:34:18  
16 each other maybe a month or two ago regarding this 10:34:21  
17 lawsuit regarding getting representation, and he was 10:34:24  
18 almost as pissed off as I was that he wasn't able to 10:34:27  
19 get counsel to represent him. 10:34:30  
20 Q Okay. So he didn't talk to you after his 10:34:43  
21 deposition which happened in the past -- 10:34:46  
22 A No. 10:34:49  
23 Q -- couple weeks? 10:34:50  
24 A No. 10:34:51  
25 Q So while you were -- the Public Corruptions 10:34:54

1 Unit? 10:35:04

2 A Yes. 10:35:06

3 Q You know what I'm saying when I talk -- you 10:35:06

4 know what I'm referring to -- 10:35:07

5 A That's correct. That's the right term. 10:35:08

6 Q How often were you interacting directly 10:35:11

7 with Sheriff -- with the sheriff, Villanueva? 10:35:12

8 A Very rarely. I would see him moderately 10:35:17

9 often. And defining that would be, you know, maybe 10:35:24

10 once every two weeks I would see him in the hallway 10:35:28

11 or run into him. But I had very, very minimal 10:35:31

12 interactions with him regarding my work at that -- 10:35:36

13 at the unit. 10:35:37

14 The first thing I did when I got there was 10:35:41

15 drafted a letter for him to sign recusing himself 10:35:47

16 from all of the criminal inquiries and appointing, 10:35:53

17 for the limited purpose of those criminal 10:35:56

18 investigations, the undersheriff as the person to be 10:35:59

19 the decision-maker regarding final decisions on 10:36:04

20 those things so that he was recused from those 10:36:07

21 things. 10:36:09

22 So we stuck to that pretty religiously and 10:36:10

23 never really spoke about the criminal 10:36:15

24 investigations. 10:36:18

25 Q And was the undersheriff at the time of 10:36:24

1	that delegation, was that Tim Murakami?	10:36:27
2	A No. It was Ray, and I think it's R-e-y,	10:36:30
3	Leyva, L-e-y-v-a.	10:36:36
4	Q And he wasn't undersheriff for too long,	10:36:40
5	though, right?	10:36:43
6	A Correct.	10:36:44
7	Q Yeah.	10:36:45
8	Did you have any discussions with anybody	10:36:46
9	about his replacement or his being replaced as	10:36:47
10	undersheriff?	10:36:52
11	A Leyva's?	10:36:53
12	Q Yeah.	10:36:55
13	A No.	10:36:55
14	If I could expound on that, it might save	10:37:01
15	you some grief with your future questions.	10:37:03
16	There are nine ranks in the Sheriff's	10:37:06
17	Department. I can't tell you how low my rank was	10:37:07
18	but it was curb level, and the elected sheriff, of	10:37:09
19	course, is the highest rank.	10:37:12
20	So the interaction between those two ranks	10:37:14
21	is pretty limited, if that will help you formulate	10:37:16
22	your questions regarding me giving advice or input	10:37:19
23	or guidance into at least those kinds of decisions.	10:37:22
24	Q Uh-huh. I appreciate that.	10:37:26
25	Going back to the -- revert back to your	10:37:27

1 timeline real quick. I probably lost track. I was 10:37:34  
2 trying to take notes on this. Let me play a little 10:37:37  
3 catch-up. 10:37:40  
4 So you were hired back on in 2018. 10:37:41  
5 A 2019. 10:37:45  
6 Q 2019. 10:37:46  
7 Right. Because he wins the election in 10:37:51  
8 November of '18, and then he starts being sheriff, 10:37:54  
9 like, somewhere in December of '18? 10:37:56  
10 A Correct. 10:37:58  
11 Q Okay. And then you're contacted in 2019? 10:37:58  
12 A Well, in order to get rehired, I had to go 10:38:03  
13 through the entire hiring process again. 10:38:05  
14 Q Right. 10:38:07  
15 Was this first idea of you being rehired 10:38:09  
16 was a conversation that was set up by the 10:38:12  
17 attorney -- I've forgotten his name -- Michael and 10:38:15  
18 you and Mr. -- and the sheriff? 10:38:20  
19 A That's correct. 10:38:23  
20 Q Okay. And did the sheriff explain that he 10:38:24  
21 was starting a new unit and wanted some help with 10:38:27  
22 it? 10:38:30  
23 A He explained that during the campaign, he 10:38:30  
24 was approached repeatedly by attorneys, media, 10:38:33  
25 citizens, the electorate about -- about public 10:38:36

1 corruption in Los Angeles. 10:38:41

2 And when I had the meeting with him, that's 10:38:43

3 what he explained, and he wanted -- he was a little 10:38:45

4 bit unaware of how public corruption investigations 10:38:48

5 occurred in Los Angeles County. 10:38:52

6 I, at one time, worked on loan to the FBI 10:38:54

7 in a Public Corruption Unit. He knew that I had 10:38:57

8 that experience, and so that was really the primary 10:39:00

9 purpose of the meeting. I don't even know -- and I 10:39:04

10 can't recall if at that time during that meeting he 10:39:06

11 had in his head the idea to form, within the 10:39:09

12 Sheriff's Department, a Public Corruption Unit. 10:39:14

13 Q I see. 10:39:16

14 Okay. So you were kind of on the ground 10:39:18

15 floor starting this? 10:39:19

16 A Yes, sir. 10:39:21

17 Q Okay. And -- sorry. I had a question that 10:39:21

18 popped in my head, and it's -- it will come back. 10:39:33

19 Have you had any discussions with 10:39:44

20 Mr. Villanueva about him being designated "Do Not 10:39:46

21 Rehire"? 10:39:51

22 A I have not. 10:39:53

23 Q So he's never talked to you about any 10:39:57

24 emotional distress that he might be suffering 10:39:59

25 because of being designated "Do Not Rehire"? 10:40:01

1 A He has not. 10:40:04

2 Q Oh, so do you know, when a -- going back to 10:40:16

3 this initial meeting with the sheriff, did he 10:40:20

4 mention to you how your name came up or how -- how 10:40:26

5 it arose that he wanted to talk to you? 10:40:29

6 A I believe Mr. Goldfeder and Villanueva were 10:40:32

7 friends, and I believe that's how it came up. 10:40:37

8 Q Oh, okay. So he was discussing the idea of 10:40:41

9 this public corruptions issue, and then 10:40:43

10 Mr. Goldfeder felt you were a good person to talk 10:40:47

11 to? 10:40:51

12 A I believe that's accurate. I don't know 10:40:54

13 that for a fact, but yes, I believe that's accurate. 10:40:55

14 Q Okay. So you're doing work on this Public 10:40:59

15 Corruptions -- Public Corruption Unit, and then how 10:41:08

16 long do you do that? 10:41:12

17 A From July of '19 until January of '24 -- 10:41:14

18 I'm sorry. Is it '24? 10:41:24

19 Q I think it's '23. 10:41:26

20 A I apologize. I just don't -- whenever 10:41:27

21 Robert Luna was sworn -- he was sworn in 10:41:30

22 December '23, yes, so it was January of '24 that -- 10:41:32

23 when I ended my service. 10:41:34

24 Q Let's make sure we're right, because I 10:41:37

25 think the election year is '22. 10:41:38



1	A	You know what, then I'm screwed up by a	10:41:41
2		year and I apologize.	10:41:44
3		Then if Robert Luna was elected in '22,	10:41:45
4		I left County service in January of '23. That	10:41:48
5		sounds right.	10:41:51
6	Q	And I think I -- I apologize, because you	10:41:51
7		actually did say January '23 before.	10:41:53
8		So after January '23, what do you do next?	10:41:55
9	A	In my life?	10:41:58
10	Q	In your career, I guess.	10:41:59
11	A	Oh, essentially, none of your business.	10:42:01
12	Q	Well, you were doing some work with	10:42:07
13		South Pasadena?	10:42:09
14	A	I was.	10:42:10
15	Q	What were you doing there?	10:42:11
16	A	Again, I'm not going to answer that --	10:42:11
17	Q	You're not going to answer.	10:42:14
18	A	-- Brian.	10:42:21
19	Q	Do you know if you have any kind of "Do Not	10:42:25
20		Rehire" designation from the County?	10:42:27
21	A	I am unaware.	10:42:30
22	Q	Unaware.	10:42:31
23		This is actually previously marked	10:42:48
24		Exhibit 20. This was marked at Sheriff Villanueva's	10:42:49
25		deposition.	10:42:59

1                   You're entitled to read the whole thing if                   10:43:01  
2           you like.                   10:43:03  
3           A       Thank you.                   10:43:04  
4           Q       But do you recognize this article at all?           10:43:04  
5           A       I don't.                   10:43:08  
6           Q       Okay. And just for the record, it's an           10:43:09  
7           April 1st, 2022 L.A. Times article.           10:43:11  
8                   And on the second page, there's a second           10:43:17  
9           paragraph.                   10:43:20  
10          A       Yes, sir.                   10:43:22  
11                   MR. NEACH: Do you want a copy, Alex?           10:43:23  
12                   MR. DI BONA: Yes, please.           10:43:25  
13                   MR. NEACH: Okay.           10:43:29  
14                   I've lost track of it.           10:43:29  
15          BY MR. NEACH:           10:43:35  
16          Q       The second page, second paragraph, it           10:43:35  
17           says -- it's talking about an interview with the           10:43:37  
18           sheriff. And it said "The interview itself was even           10:43:39  
19           odder, most notably for the out-of-nowhere           10:43:42  
20           evidence-free assertion that county Inspector           10:43:44  
21           General Max Huntsman is a Holocaust denier."           10:43:46  
22                   Did you have any discussions at the time           10:43:51  
23           with the sheriff or anybody else about Max Huntsman           10:43:52  
24           being an Holocaust denier?           10:43:55  
25          A       I truly do not recall that.           10:43:59

1 I would very much intentionally, like 10:44:06  
2 I just testified to previously, keep him out of the 10:44:09  
3 loop. And the gist of our conversations, "our" 10:44:12  
4 meaning mine and Villanueva's conversations, were 10:44:15  
5 quite frequently about dogs and baseball and, you 10:44:18  
6 know, happenings in, you know, the news and stuff 10:44:21  
7 like that. 10:44:24

8 I never spoke to him about the criminal 10:44:25  
9 investigations on purpose so that if and when the 10:44:27  
10 time came that I was under oath during a criminal 10:44:30  
11 proceeding, I could truthfully testify that he 10:44:33  
12 didn't direct me to do anything and he had no 10:44:36  
13 bearing on the decision-making. 10:44:39

14 And hopefully this will save you some 10:44:43  
15 questions here. It's possible -- and, again, 10:44:45  
16 I don't have a clear memory of it -- that in some 10:44:49  
17 setting I had mentioned that directly to him. 10:44:52

18 I don't have a clear recollection of doing 10:44:57  
19 that. It is -- it is my memory -- and I could be 10:44:58  
20 wrong, but it is my memory that I mentioned this to 10:45:04  
21 the undersheriff, Timothy Murakami, and/or the chief 10:45:09  
22 of staff -- 10:45:13

23 Now I'm drawing a blank. 10:45:16

24 Q John Satterfield. 10:45:19

25 A Thank you. Yes. 10:45:20

1 Q Satterfield, S-a-t-t-e-r -- 10:45:20

2 A And that they then imparted it to the 10:45:21

3 sheriff. 10:45:24

4 It is also possible -- because this 10:45:24

5 information has zero bearing on a criminal inquiry, 10:45:28

6 or at least on my criminal inquiry, it is possible 10:45:31

7 that I mentioned it directly to the sheriff as a 10:45:33

8 thing of interest or -- or a thing of in passing 10:45:37

9 type thing, because it had no bearing on any 10:45:42

10 elements of a crime being committed. 10:45:44

11 I simply do not have a clear recollection 10:45:46

12 of actually having that direct conversation with the 10:45:50

13 sheriff. And in the subpoena, there's a reference 10:45:53

14 to one of the -- here, I'm rambling, not answering 10:45:57

15 your question directly. 10:46:03

16 But in the subpoena, there's a reference 10:46:04

17 to -- to an actual meeting between the sheriff, 10:46:05

18 myself, the undersheriff, Murakami, and Satterfield. 10:46:09

19 And I don't have a clear recollection of that. 10:46:17

20 There were occasions when the four of us 10:46:19

21 would be together in a room. It was pretty rare, 10:46:21

22 pretty unusual. Again, I am the lowest rank on the 10:46:24

23 department and you're talking about the No. 1, the 10:46:27

24 No. 2 and then the No. 1's aide, who was a five or a 10:46:29

25 six rank above me. And I just didn't deal with 10:46:35

1	those people of that rank that often.	10:46:38
2	Q Uh-huh.	10:46:41
3	A And I hope that helps you frame some other	10:46:41
4	questions.	10:46:44
5	Q It does.	10:46:45
6	A Good.	10:46:45
7	Q I just want to make sure I -- because, you	10:46:47
8	know, what we always got to make sure is that we	10:46:48
9	cover kind of all the pieces, because if it comes	10:46:51
10	back at trial and if you have to testify at trial,	10:46:54
11	we don't hear something that's going to surprise us.	10:46:56
12	A I understand.	10:46:58
13	Q So let me just start that -- so to the	10:46:59
14	extent you have any kind of memory of a conversation	10:47:02
15	with any one of those three individuals, the	10:47:06
16	sheriff, undersheriff or chief of staff, do you	10:47:09
17	recall at all where that conversation may have	10:47:11
18	happened?	10:47:14
19	A I don't. I don't. I'm sorry.	10:47:19
20	Q You don't have to apologize, sir. Just to	10:47:24
21	the best of your recollection.	10:47:26
22	And -- well, let me ask it this way: To	10:47:27
23	the extent you met with any of those three	10:47:30
24	individuals, whether it was one or at any particular	10:47:32
25	time, it sounds like it wasn't that much, but where	10:47:37

1 would those meetings tend to take place? 10:47:39

2 A They're very limited where we'd all be 10:47:44

3 together in the same room at the same place. I can 10:47:46

4 remember once or twice being in the undersheriff's 10:47:49

5 office with both the undersheriff and 10:47:52

6 Commander Satterfield. 10:47:57

7 And I can remember once or twice being 10:47:58

8 in -- I think they call it the executive conference 10:48:03

9 room or the -- there's a -- there's a -- next to the 10:48:06

10 sheriff's office is a small conference room with a 10:48:09

11 table and chairs for maybe eight or ten people, and 10:48:12

12 I remember being in that room, at least once and 10:48:17

13 maybe twice, with the undersheriff and the 10:48:19

14 commander. 10:48:23

15 Q There is a name for it, and I've forgotten 10:48:25

16 what it was. 10:48:27

17 A Sometimes they call it the sheriff's 10:48:28

18 library, I believe -- 10:48:29

19 Q The library is what it is. 10:48:30

20 A -- but there's not a damn book in sight. 10:48:32

21 Q It was either Mr. Satterfield or 10:48:35

22 Mr. Murakami that described it as a library. 10:48:37

23 Does that -- that jives with your memory? 10:48:40

24 A Yes. 10:48:43

25 Q Okay. So to the extent there was any 10:48:43

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1 conversation with -- about Max Huntsman being a 10:48:45  
2 Holocaust denier, it would have taken place in 10:48:48  
3 either the library or one of the offices of 10:48:51  
4 Mr. Satterfield or Mr. Murakami, right? 10:48:54  
5 A Yes. 10:48:56  
6 And as a side note, I know why they call it 10:48:57  
7 the library. At one time that was the chambers of 10:48:59  
8 the presiding judge of the L.A. County courts and 10:49:02  
9 that was the law library for his chambers. 10:49:05  
10 Q Ah, interesting. 10:49:08  
11 A I did know that story, yeah. 10:49:09  
12 Q A little bit of trivia. 10:49:11  
13 A Yeah. 10:49:13  
14 Q Well, let me ask you this way, too: When 10:49:13  
15 you were doing your work, did you come across 10:49:16  
16 evidence that led you to believe that Max Huntsman 10:49:18  
17 might be a Holocaust denier? 10:49:21  
18 A Yes. 10:49:22  
19 Q And what evidence was that? 10:49:23  
20 A A conversation I had with the woman that 10:49:25  
21 was purportedly his housekeeper. 10:49:27  
22 Q And how did you come to be talking to -- 10:49:31  
23 well, do you recall what her name is? 10:49:33  
24 A I do not. I'm sorry. 10:49:35  
25 Q Do you recall where the conversation 10:49:37

1	happened?	10:49:38
2	A Yes.	10:49:38
3	Q Where was that?	10:49:39
4	A The Home Depot on San Fernando Road in the	10:49:40
5	City of Los Angeles about a mile from	10:49:43
6	Dodger Stadium.	10:49:47
7	Q And how did you come to be there?	10:49:50
8	A I was conducting sporadic surveillance of	10:49:53
9	Mr. Huntsman's home and activities. I thought at	10:49:58
10	first I wasn't quite seeing what I was seeing. But	10:50:04
11	Mr. Huntsman never had any garbage and never put any	10:50:08
12	garbage out on the curb, which was a little -- same	10:50:12
13	look that you have with furrowing your eyebrow, kind	10:50:15
14	of unusual.	10:50:19
15	And it finally came to me that Mr. Huntsman	10:50:20
16	simply doesn't engage those services and he takes	10:50:22
17	his trash to work or somewhere else to get rid it.	10:50:25
18	So there's never any trash cans in front of his	10:50:30
19	home, which, as you're well aware, is a	10:50:32
20	investigative technique sanctioned by the	10:50:33
21	U.S. Supreme Court.	10:50:36
22	And during one of those surveillances, I	10:50:37
23	followed what I believed to be a housekeeper away	10:50:39
24	from his home in the late afternoon, early evening,	10:50:41
25	and I wound up following her to the Home Depot that	10:50:46



1 I just described. 10:50:50

2 Q Okay. And so did you ask to talk to her in 10:50:51

3 the parking lot? 10:50:54

4 A Actually inside of the store. 10:50:55

5 Q Okay. And what did she tell you? 10:50:57

6 A That she works for Mr. Huntsman, that the 10:51:04

7 family is kind and loving, and she really didn't -- 10:51:09

8 didn't get into -- she told me a lot of things of a 10:51:18

9 personal nature that are -- that have no bearing 10:51:23

10 here or anywhere else, that everybody's 10:51:25

11 housekeeper -- I don't know if you have a 10:51:27

12 housekeeper or anybody else has a housekeeper, but 10:51:29

13 your housekeepers have great intimate knowledge of 10:51:32

14 your personal lives and your feelings and your 10:51:35

15 opinions and everything. 10:51:37

16 So the one thing she did tell me was that 10:51:38

17 she -- her English was somewhat broken. My Spanish 10:51:42

18 is very poor, but we were able to -- it was kind of 10:51:46

19 funny and we laughed about it. 10:51:49

20 It was -- in describing the fact that he 10:51:52

21 didn't believe what the Germans did during 10:51:54

22 World War II, she kept comparing it to people that 10:51:57

23 believe the world is flat. 10:52:00

24 And there was -- there was a word for that 10:52:01

25 in Spanish, and she was able to translate it into 10:52:03

1 English for me. And we both kind of laughed about 10:52:05  
2 that, like some people believe the world is flat. 10:52:07  
3 And -- and that was how -- that was how she 10:52:10  
4 was able to relate to me that subject matter of 10:52:15  
5 Mr. Huntsman not believing that the Nazi Holocaust 10:52:18  
6 had occurred. 10:52:25  
7 Q Did she explain, was it a conversation that 10:52:28  
8 she had directly with him, or was it something she 10:52:31  
9 overheard? Did you get any knowledge of that? 10:52:33  
10 A No, nothing she had overheard. It was 10:52:36  
11 based on literature and things she had seen in the 10:52:38  
12 home. 10:52:41  
13 Q Okay. So it's nothing that she heard from 10:52:43  
14 him? 10:52:45  
15 A That is correct. 10:52:45  
16 Q Okay. Do you recall what the literature 10:52:49  
17 was that she -- 10:52:51  
18 A I do not. 10:52:52  
19 Q Was she able to recall what the literature 10:52:52  
20 was? 10:52:55  
21 A Somewhat, yes, both photographs and written 10:52:58  
22 literature. 10:53:01  
23 And if I can save you, her interview is in 10:53:02  
24 my notes. Her interview is on audio digital tape. 10:53:06  
25 It is in the case file in the possession of the 10:53:09

1 Sheriff's Department. 10:53:12

2 I am hoping -- I spoke to your associate, 10:53:14

3 Jason Tokoro, about you have the power of subpoena. 10:53:15

4 I would highly recommend that you ask for those 10:53:21

5 materials from the Sheriff's Department. 10:53:25

6 Q And this is -- this would be an 10:53:28

7 investigative file related to Max Huntsman? 10:53:29

8 A That is correct. 10:53:32

9 Q And these were handwritten notes that you 10:53:40

10 took? 10:53:42

11 A Yes. 10:53:42

12 Q Do you recall when the conversation took 10:53:52

13 place? 10:53:53

14 A I do not. 10:53:55

15 I can see from this L.A. Times article, 10:53:56

16 it's April '22, so obviously at some point in time 10:53:59

17 before that. And, again, I apologize. I simply 10:54:04

18 don't recall, you know, when. My memory is that it 10:54:07

19 was the winter months. It was dark somewhat early. 10:54:12

20 That happens here in California. 10:54:15

21 Q Uh-huh. 10:54:18

22 Did you hear anything from -- about 10:54:26

23 Max Huntsman potentially being a Holocaust denier 10:54:30

24 from any other source? 10:54:33

25 A I did not. 10:54:35

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1 Q Had somebody directed you to do a 10:54:42  
2 surveillance of the Huntsman house? 10:54:49  
3 A They did not. 10:54:51  
4 Q You did that on your own? 10:54:52  
5 A I did. 10:54:53  
6 Q Did you have -- would you have to report 10:55:01  
7 the surveillance that you're doing to the lieutenant 10:55:02  
8 that you were working for? 10:55:05  
9 A It would be in my notes. 10:55:07  
10 Q And your notes would be something you'd 10:55:14  
11 turn in as a regular part of things so they know 10:55:17  
12 what you're doing? 10:55:20  
13 A Correct. Well, no. 10:55:21  
14 Q Okay. How -- 10:55:22  
15 A The answer to that is no. 10:55:23  
16 Q Okay. How would the lieutenant know you're 10:55:24  
17 doing surveillance through your notes? 10:55:27  
18 A I'm sorry. Either you phrased that 10:55:30  
19 question poorly or I answered it poorly. 10:55:34  
20 The lieutenant would know I was doing 10:55:36  
21 surveillance because I'd verbally tell him, "Hey, 10:55:38  
22 I'm going to be out from 4:00 to midnight sitting in 10:55:40  
23 the car drinking coffee and doing the thing, so, you 10:55:44  
24 know, if something happens or I get hit by a drunk 10:55:47  
25 driver or if you want to know why I'm out from 10:55:50

1 4:00 to midnight, this is why." 10:55:53

2 That's how he would know. 10:55:54

3 Q Right. 10:55:55

4 A The surveillance would be in my notes. 10:55:56

5 Q Okay. 10:55:57

6 A We keep these blue -- well, I keep blue 10:55:58

7 flip-over notebooks that are actually bound and 10:56:02

8 manufactured by the Sheriff's Department from -- 10:56:05

9 they're primarily used by homicide detectives, but 10:56:07

10 because I did that for a very long time, it's a 10:56:10

11 great way to -- to keep notes in -- in these blue -- 10:56:12

12 small blue notebooks, and then they become a 10:56:17

13 permanent part of the case file. 10:56:20

14 Q I see. I see. 10:56:21

15 A So when you subpoena my notes, they'll be 10:56:22

16 in there. 10:56:24

17 Q All right. Was there ever a time where you 10:56:25

18 told the lieutenant you were working for -- 10:56:28

19 specifically on this Public Corruptions Unit, just 10:56:29

20 that time period, and they said "Why are you" -- you 10:56:33

21 know, "Don't do that surveillance, that's not 10:56:35

22 necessary"? 10:56:39

23 A No. 10:56:40

24 Q Okay. I'm sorry. 10:56:40

25 So at the time of this Exhibit 20, this 10:56:55

1 April 1, 2022, were you aware that shortly before 10:56:57  
2 this a complaint was filed by Max Huntsman with 10:57:00  
3 respect to the sheriff? 10:57:05  
4 A I am not. 10:57:10  
5 Q Were you aware that around this time that a 10:57:10  
6 complaint had been filed by Esther Lim with respect 10:57:12  
7 to the sheriff? 10:57:14  
8 A I am not. 10:57:15  
9 Q Did you have any discussions with the 10:57:15  
10 sheriff about any complaint that Max Huntsman had 10:57:17  
11 filed against him? 10:57:20  
12 A No. 10:57:22  
13 Q At any time, did you have a conversation 10:57:22  
14 with the sheriff about any complaint that Esther Lim 10:57:24  
15 had filed against him? 10:57:27  
16 A No. 10:57:28  
17 Q And same questions, did you have any 10:57:29  
18 conversations with Undersheriff Murakami about any 10:57:31  
19 complaint that had been filed by Max Huntsman -- 10:57:36  
20 A No. 10:57:39  
21 Q -- against the sheriff? 10:57:39  
22 Okay. And did you have any discussions 10:57:41  
23 with Mr. Satterfield about that? 10:57:43  
24 A No. 10:57:46  
25 MR. NEACH: We're just at an hour. Can we 10:57:53

1 take a break? 10:57:55

2 MR. DI BONA: Uh-huh. 10:57:55

3 THE VIDEOGRAPHER: This marks the end of 10:57:56

4 Media No. 1. The time is 10:58 a.m. We're off the 10:57:57

5 record. 10:58:00

6 (Off the record from 10:58 - 11:03 a.m.) 10:58:01

7 THE VIDEOGRAPHER: This marks the beginning 11:03:12

8 of Media No. 2. The time is 11:03 a.m. We're on 11:03:13

9 the record. 11:03:17

10 BY MR. NEACH: 11:03:34

11 Q Just a few questions about following up on 11:03:35

12 the housekeeper. 11:03:37

13 So you said you don't remember her name? 11:03:39

14 A I do not. 11:03:41

15 Q Okay. She was Hispanic? 11:03:41

16 A Yes. 11:03:44

17 Q Okay. Do you recall what she looks like? 11:03:44

18 A Yes. 11:03:47

19 Q What does she look like? 11:03:48

20 A About 40 years old, shoulder-length brown 11:03:49

21 hair. She was a little bit short, probably 11:03:53

22 five-foot, five-foot one and about 150 pounds. 11:03:55

23 Q Any distinguishing facial characteristics 11:04:06

24 that you recall? 11:04:09

25 A No. She was driving an older, black, 11:04:11

1 four-door Toyota Camry. And in my notes are her 11:04:13  
2 name and her date of birth and her cell number and 11:04:17  
3 the license plate number to the car. 11:04:22

4 Q I know you previously -- I was going to 11:04:47  
5 cover this topic with you. And you've declined to 11:04:49  
6 answer any -- answer any questions, but I kind of 11:04:52  
7 have to do it just to make sure. 11:04:54

8 A Sure. I'll politely decline before you 11:04:56  
9 even ask the question. 11:04:59

10 Q That's fine. So I'm just -- this is 11:05:00  
11 previously marked Exhibit 27 from Mr. Villanueva's 11:05:01  
12 deposition. 11:05:04

13 And this has to do with -- it's reporting 11:05:07  
14 about you and the South Pasadena Police Department. 11:05:10

15 Are you declining to answer any questions 11:05:12  
16 regarding your work that you did with South Pasadena 11:05:15  
17 Police Department? 11:05:17

18 A Yes. 11:05:18

19 Q At this time, were you giving presentations 11:05:21  
20 for the Sheriff's Department? 11:05:25

21 A I'm not going to answer that, Brian. 11:05:27

22 Q So you're not going to answer any 11:05:29  
23 questions, anything about anything you did from 11:05:30  
24 January '23 forward? 11:05:33

25 A Regarding the South Pasadena Police 11:05:36



1 Department? 11:05:39

2 Q Let me -- I was trying to just go broader. 11:05:40

3 Basically, you're not going to answer any 11:05:44

4 questions about anything in your career from 11:05:45

5 January '23 to the present? 11:05:47

6 A If you can explain to me, Brian, how that's 11:05:49

7 germane to this or the 14 pages of subpoena, I will 11:05:52

8 consider answering that. But until you can explain 11:05:55

9 to me how that's germane to this, I will not answer 11:05:57

10 it. 11:06:00

11 Q Yeah. Sometimes we're entitled to learn 11:06:01

12 about things, like, bias -- 11:06:03

13 A I'm aware of it. 11:06:04

14 Q -- and culpability. 11:06:05

15 Okay. So that's fine. 11:06:06

16 (Deposition Exhibit 2 11:06:15

17 was marked for identification.) 11:06:15

18 MR. NEACH: Exhibit 2. 11:06:27

19 BY MR. NEACH: 11:06:29

20 Q Exhibit 2, I'm showing you, this is an 11:06:29

21 October 23, 2019 L.A. Times article titled "Sheriff 11:06:31

22 hires corruption investigator accused of posing as 11:06:37

23 deputy." 11:06:41

24 Have you seen this article before? 11:06:42

25 A Yes. 11:06:44

1 Q Okay. And I can sense that you didn't take 11:06:44  
2 too kindly to it; is that right? 11:06:51  
3 A Good sense, Brian. 11:06:53  
4 Q Yeah. 11:06:54  
5 And so tell me what your understanding is 11:06:54  
6 of this. 11:06:56  
7 A No. 11:06:57  
8 Q You're not going to discuss it? Okay. 11:06:57  
9 Is that you in the picture, though? 11:07:00  
10 A Oh, yeah. 11:07:02  
11 Q And it had to do with you going into the 11:07:03  
12 County jail, right? 11:07:07  
13 A Again, I'm not going to answer, Brian. 11:07:09  
14 Q You're not going to answer. Okay. 11:07:11  
15 Were you ever disciplined or reprimanded at 11:07:16  
16 any time while in the Sheriff's Department? 11:07:19  
17 A Oh, God, yes. 11:07:21  
18 Q Yeah. 11:07:23  
19 When was the last time? 11:07:25  
20 A You know, when I was working homicide, 11:07:35  
21 I crashed a car and it was my fault. I'm trying to 11:07:37  
22 think. And I -- it wasn't really a real car crash. 11:07:43  
23 I hit a curb. I was very tired and pulling out of 11:07:46  
24 the parking lot at the Homicide Bureau and I went 11:07:50  
25 over a curb and messed up a car and I got 11:07:53

1 disciplined for that, which I thought was blatantly 11:07:55  
2 unfair, by the way. 11:07:57

3 Q Do you recall when that was? 11:08:00

4 A In the teen -- like 2012, 2013, maybe, the 11:08:04  
5 last time. 11:08:10

6 Q I may have asked it more specifically, but 11:08:17  
7 it's very -- in a general sense, do you recall any 11:08:19  
8 specific discussions you had with the sheriff while 11:08:23  
9 you're on the Public Corruption Unit about 11:08:26  
10 Max Huntsman? 11:08:31

11 A Specifically, no. In general, yes. 11:08:38

12 Q Okay. What were the general conversations 11:08:45  
13 that you recall? 11:08:48

14 A Very, very bright guy. Yale Law School 11:08:52  
15 grad. Kind of an odd childhood and upbringing. 11:08:56  
16 A product of divorce. His true name is not 11:09:06  
17 Huntsman. He's got a different last name. 11:09:10  
18 I remember talking about that. 11:09:13

19 And he had, like we all do, kind of a 11:09:14  
20 countywide reputation throughout the County because 11:09:21  
21 he had been a practicing prosecutor for many years, 11:09:23  
22 so -- and I didn't know him. I had never met the 11:09:26  
23 guy. Like I said, to this day, I've never shook his 11:09:29  
24 hand, never met the guy. I've been in the same room 11:09:31  
25 with him. But he would -- we would talk about that 11:09:34

1	once in a while.	11:09:36
2	Q Uh-huh.	11:09:38
3	A He had a couple of high-profile cases when	11:09:39
4	he was a prosecutor -- actually, now that I think	11:09:41
5	about it, dealing with public corruption, oddly	11:09:44
6	enough, with a small incorporated city in Southeast	11:09:46
7	L.A. County, City of Bell.	11:09:49
8	But there were, you know, kind of	11:09:52
9	general -- things of that general nature.	11:09:55
10	Q Uh-huh.	11:09:57
11	And then how about regarding Esther Lim?	11:09:58
12	A I'm sorry?	11:10:00
13	Q Conversations that you recall while with	11:10:03
14	the Public Corruption Unit, any discussions	11:10:04
15	regarding Esther Lim that you recall with the	11:10:07
16	sheriff?	11:10:10
17	A Never. I don't -- I know that name.	11:10:10
18	I don't even know what her title was in the County.	11:10:11
19	And I'm pretty comfortable I have never had a	11:10:13
20	discussion about her.	11:10:17
21	MR. NEACH: Right now, I don't have	11:10:24
22	anything further. He's got some questions, it	11:10:26
23	sounds like, and I might have follow-up. But I	11:10:29
24	appreciate your time, sir.	11:10:31
25	\\	

## EXAMINATION

BY MR. DI BONA:

Q All right, sir. Just some brief 11:10:34  
follow-ups. 11:10:35

I believe you mentioned you were on loan to 11:10:36  
the FBI for the Public Corruption Unit; is that 11:10:38  
right? 11:10:42

A Yes. 11:10:42

Q Can you explain for those of us that don't 11:10:42  
work in law enforcement, what does it even mean to 11:10:45  
be on loan to another department? 11:10:48

A All of the major federal agencies have a 11:10:49  
mechanism in place where they take local sworn law 11:10:53  
enforcement officers under their wing and make them 11:10:56  
what's commonly referred to as a task force officer. 11:11:00  
They use the initials TFO. 11:11:05

So both the FBI, the Secret Service, 11:11:07  
U.S. Treasury, Homeland Security, all of those 11:11:12  
federal agencies in law enforcement do that. 11:11:15

And in the late 1990s, my partner and I, 11:11:20  
conducting a murder investigation, came across some 11:11:25  
information regarding pretty widespread public 11:11:29  
corruption amongst a local Southern California 11:11:33  
police department. 11:11:36

We brought it to the attention of the 11:11:37

1       sheriff at the time. The elected sheriff was 11:11:40  
2       Sherman Block. He directed us to the FBI. We 11:11:42  
3       presented that evidence to the FBI. 11:11:45  
4               And then, ultimately, I was -- I was asked 11:11:47  
5       to join in the investigation. And I worked at the 11:11:51  
6       FBI for about a year and a half or so on loan as a 11:11:54  
7       task force officer investigating public corruption. 11:12:00  
8       Q       And how many years do you have working in a 11:12:05  
9       Public Corruption Unit, just overall? 11:12:08  
10       A       Well, the year and a half at the FBI and 11:12:12  
11       then, of course, the three-plus years working under 11:12:15  
12       the administration of Mr. Villanueva. 11:12:18  
13               And when I was a young new detective, at 11:12:22  
14       times back then the Sheriff's Department and the 11:12:28  
15       executive staff on the Sheriff's Department would 11:12:33  
16       task specific detectives to look at allegations of 11:12:37  
17       public corruption, and I was one of those people. 11:12:40  
18               So over the years, really, since the -- 11:12:42  
19       since the mid-1980s, off and on again, I've been 11:12:45  
20       tasked with looking at -- at allegations of 11:12:48  
21       government employees committing criminal conduct 11:12:52  
22       acts. 11:12:55  
23       Q       And I know this was mentioned earlier, but 11:12:57  
24       just how long do you -- estimate is fine. How many 11:12:59  
25       years did you have as a detective just overall? 11:13:03

1	A	35.	11:13:07
2	Q	Thank you for your service.	11:13:07
3		You were -- I know this was mentioned	11:13:10
4		earlier. Just for the record, you were a member of	11:13:13
5		the Public Corruption Unit for the Los Angeles	11:13:15
6		County Sheriff while Sheriff Villanueva was sheriff;	11:13:18
7		is that right?	11:13:23
8	A	Yes.	11:13:23
9	Q	And are you aware that there's certain	11:13:24
10		critics of that department that have charged that	11:13:26
11		that unit was formed by Sheriff Villanueva in order	11:13:30
12		to retaliate against his political opponents.	11:13:35
13		Are you broadly aware of that criticism?	11:13:39
14	A	I am.	11:13:41
15	Q	I'd like to give you a chance on the record	11:13:42
16		to respond to that.	11:13:43
17	A	I -- I have zero indication or evidence of	11:13:45
18		that being the case. I was raised primarily in	11:13:49
19		Chicago. I am familiar with and grew up around real	11:13:55
20		public corruption. And I would not have been	11:14:00
21		associated with nor tolerated any of those types of	11:14:04
22		allegations were they true where it was some kind of	11:14:10
23		a secret police or a hit squad.	11:14:12
24		I had no allegiance whatsoever to the	11:14:16
25		elected sheriff. I, in fact, did not support nor	11:14:18

1 did I vote for him, which he's well aware of. 11:14:22

2 And -- and I -- you know, those allegations, like 11:14:24

3 many other things, are, quite frankly -- if they are 11:14:29

4 true, I am unaware of it. And if they are true, 11:14:34

5 I would have -- I would have spoken up. 11:14:36

6 I had no -- there was nothing -- I'm an 11:14:38

7 at-will employee. I -- I had that kind of 11:14:43

8 relationship with him where I believed I could tell 11:14:45

9 him this is wrong, don't go down that highway, it's 11:14:48

10 unlawful, it's unethical, it's illegal, it's 11:14:51

11 immoral. I wouldn't have been afraid at all to say 11:14:54

12 that. I've said that to other sheriffs under which 11:14:57

13 I have worked. 11:15:01

14 And that's my answer to your question. 11:15:01

15 Q I think it's in the answer, but just to be 11:15:04

16 clear, did Sheriff Villanueva ever ask you to, in 11:15:06

17 your opinion, retaliate against any of his political 11:15:09

18 opponents? 11:15:12

19 A Unequivocally, absolutely not. I don't 11:15:13

20 know how the sheriff did in his deposition. If 11:15:15

21 anything, he was somewhat afraid and intimidated by 11:15:19

22 me. Or I believe that he was. I hope that he was a 11:15:23

23 little bit, because I presented myself to him as a 11:15:25

24 straight shooter down the line and I wouldn't do 11:15:28

25 anything out of blind loyalty to the unelected 11:15:32



1 official, especially here in Los Angeles County. 11:15:35

2 Q Did Tim Murakami ever ask you to retaliate 11:15:38

3 against any perceived political opponent of 11:15:42

4 Sheriff Villanueva? 11:15:45

5 A Never. 11:15:46

6 Q And just to make sure I've covered it, did 11:15:47

7 anybody ever, in your chain of command or in the 11:15:51

8 Sheriff's Department who had a higher rank than you, 11:15:54

9 ever ask you to retaliate against any perceived 11:15:58

10 political opponent of Sheriff Villanueva? 11:16:00

11 A Never. 11:16:02

12 Q You are aware, I'm assuming, but that's why 11:16:03

13 it's an assumption, I'll ask: Based on your 11:16:06

14 35 years as a detective, you know in order to 11:16:08

15 establish a criminal investigation, depending on the 11:16:11

16 circumstances, there needs to be either a reasonable 11:16:13

17 suspicion or a probable cause? 11:16:16

18 Are you aware of that? 11:16:18

19 A That's a poorly phrased question. 11:16:20

20 And, no, I don't agree with that. Any time 11:16:22

21 there's an allegation or evidence or an indication 11:16:25

22 that a crime has occurred, that's what establishes 11:16:27

23 an investigation. 11:16:30

24 You don't need to have probable cause to 11:16:31

25 establish an initial criminal inquiry. 11:16:34

1 Q Understood. 11:16:39

2 And it may be a poorly phrased question, so 11:16:39

3 let me just ask it this way: While you were in the 11:16:39

4 Public Corruption Unit for Sheriff Villanueva, did 11:16:42

5 you ever start an investigation without what you 11:16:44

6 understood to be the proper legal justification for 11:16:47

7 an investigation? 11:16:51

8 A The answer to that is yes. 11:16:54

9 Q And did anybody ever ask you to conduct and 11:16:55

10 take -- conduct any investigation without a proper 11:16:58

11 legal justification? 11:17:03

12 A No. 11:17:05

13 Q And if someone had asked you that, would 11:17:05

14 you have done so? 11:17:08

15 A Absolutely not. 11:17:09

16 Q I know you didn't want to answer this so 11:17:14

17 I'm not going to ask anything about this article, 11:17:17

18 but maybe you will. Just let me know if you -- the 11:17:20

19 date on this -- 11:17:22

20 A I will not. 11:17:23

21 Q Okay. Just for the record, sir, it's fine, 11:17:23

22 let me just say for the record, do you see the date 11:17:25

23 on this article? 11:17:28

24 A I do. 11:17:29

25 Q Are you able to answer "yes" that the date 11:17:30

1 is November 30th, 2024? 11:17:32

2 A Yes. 11:17:34

3 Q Okay. And just so the record is clear, the 11:17:35

4 conversation you had with the Sheriff's Department 11:17:40

5 about Max Huntsman being a Holocaust denier, did 11:17:43

6 that happen before or after November 30th, 2024? 11:17:46

7 A Before. 11:17:50

8 Q By the way, do you -- excuse me. 11:17:55

9 Do you happen to know one way or the other 11:17:57

10 if Sheriff Villanueva has any personal knowledge -- 11:17:59

11 sorry. Let me ask it this way: Did you ever tell 11:18:02

12 Sheriff Villanueva about any of your discipline or 11:18:06

13 reprimands while you were at the Sheriff's 11:18:08

14 Department? 11:18:10

15 A I think we might have joked about it. 11:18:18

16 That's the answer to that question. We might have 11:18:24

17 joked about it. 11:18:26

18 Q Do you recall what you joked about, like 11:18:27

19 what incident was joked about? 11:18:28

20 A There was no one specific incident. As I 11:18:30

21 testified earlier, you crash a car, you get 11:18:37

22 disciplined. You use a bad word, you get 11:18:39

23 disciplined. You yell at somebody, you get 11:18:42

24 disciplined. 11:18:44

25 I, over the years, have crashed cars and 11:18:45

1 probably yelled at people I shouldn't have yelled at 11:18:48  
2 or used a bad word I shouldn't have used, so I've 11:18:51  
3 got that discipline. 11:18:54

4 And the flip side to that is that I worked 11:18:55  
5 very hard and I am -- I hate saying this, I'm 11:18:57  
6 recognized for hard work, and I appreciate that 11:19:04  
7 recognition. And so there's -- you know, there's 11:19:06  
8 the yin and the yang, I guess it is. 11:19:11

9 And I appreciate the gracious recognition 11:19:13  
10 for my hard work, and I appreciate that somebody can 11:19:16  
11 joke about me crashing cars or being a knucklehead 11:19:19  
12 when I was younger, stuff like that. 11:19:21

13 Q Conversely, did the Sheriff's Department 11:19:23  
14 ever give you any type of awards or accommodations? 11:19:25

15 A Yes. 11:19:28

16 Q Can you describe those? 11:19:29

17 A I hate patting myself on the back. 11:19:39

18 I've been recognized for hard work a bunch 11:19:42  
19 over the years. I've handled over 400 homicide 11:19:46  
20 investigations, including several high-profile ones 11:19:49  
21 and hard to solve homicides. And I've been 11:19:52  
22 recognized for that, and I appreciate that. 11:19:54

23 And over the years, I have worked other 11:19:56  
24 detective assignments and been recognized for hard 11:19:59  
25 work. I'll leave it at that because it sounds like 11:20:02

1 I'm beating my chest and the court reporter will 11:20:05  
2 yell at me if I do. 11:20:08  
3 Q All right, sir. And just to be clear, I'm 11:20:09  
4 not going to force you to do anything you're 11:20:11  
5 uncomfortable with, but on the record, if you want 11:20:13  
6 to pat yourself on the back, that's okay. I'm 11:20:15  
7 giving you a chance to. 11:20:18  
8 But is that -- 11:20:18  
9 A Thank you. 11:20:19  
10 Q -- a complete answer? 11:20:19  
11 A That's a complete answer. 11:20:20  
12 Q Do you have a recollection, as you sit here 11:20:21  
13 today, what your clearance rate for homicides was? 11:20:23  
14 A I do. 11:20:26  
15 Q What was that? 11:20:27  
16 A Basically, the national average, around 55 11:20:29  
17 to 60 percent, which is the average in the Sheriff's 11:20:31  
18 Department for homicides. 11:20:35  
19 Q And just to be clear, I think this was 11:20:40  
20 mentioned earlier, but was there -- did anyone ever 11:20:43  
21 ask you to investigate Esther Lim criminally? 11:20:45  
22 A No. 11:20:49  
23 Q And just to be clear, did 11:20:49  
24 Sheriff Villanueva specifically ask you to open an 11:20:52  
25 investigation into Max Huntsman? 11:20:55

1	A	No.	11:20:58
2	Q	I think it was mentioned earlier, but how	11:20:59
3		was it that you came to be investigating	11:21:01
4		Max Huntsman? Who told you to do that?	11:21:04
5	A	Nobody told me to do that.	11:21:06
6		My identification of Mr. Huntsman came	11:21:08
7		across the radar screen because of the inquiry	11:21:12
8		regarding the downloading of the personnel files by	11:21:17
9		the then-Constitutional Police Advisor Diana Teran.	11:21:21
10	Q	And did your investigation of Max Huntsman	11:21:26
11		have anything to do with how Sheriff Villanueva may	11:21:28
12		have felt about him?	11:21:31
13	A	It did not.	11:21:32
14	Q	And at the time that you -- that you --	11:21:33
15		sorry.	11:21:36
16		At the time you began a criminal	11:21:37
17		investigation of a Max Huntsman, did you even know	11:21:38
18		one way or the other how Sheriff Villanueva felt	11:21:42
19		about him?	11:21:46
20	A	I did not.	11:21:46
21		MR. DI BONA: I don't have any further	11:21:47
22		questions.	11:21:47
23		MR. NEACH: Yes. The gift that keeps	11:21:48
24		giving, just a few follow-ups. So -- but not many.	11:21:48
25		\\\	

FURTHER EXAMINATION

BY MR. NEACH:

Q One thing -- so what I heard you say was in 11:21:51  
the course of the Teran -- T-e-r-a-n -- 11:22:00  
investigation regarding -- there was a data breach, 11:22:03  
right? 11:22:09

A Yes. 11:22:10

Q Okay. And then you got information about 11:22:10  
Huntsman that related to a data breach? 11:22:11

A Correct. 11:22:13

Q Okay. How many times did you do 11:22:14  
surveillance at his house? Do you recall? 11:22:18

A Maybe eight. 11:22:20

Q Did you also do any -- did you follow him 11:22:28  
to work or anything like that? 11:22:31

A No. 11:22:33

Q What was the purpose of surveying the house 11:22:38  
with respect to an investigation of a data breach? 11:22:40

A I wanted to see who came and went from the 11:22:43  
home and who else he communicated with by means 11:22:46  
other than electronically. 11:22:49

And as I previously testified and you're 11:22:50  
well aware of the U.S. Supreme Court case regarding 11:22:53  
trash searches and one person's trash is another 11:22:56  
person's gold mine. 11:22:59

1 Q Okay. And so you went back there to see if 11:23:03  
2 there was trash. That was part of it, at least? 11:23:05  
3 A Yes. 11:23:08  
4 Q And you just didn't see it because he 11:23:08  
5 didn't have any, right? 11:23:10  
6 A Correct. 11:23:12  
7 Q Okay. And then do you recall any of the 11:23:13  
8 details -- I asked you about what you remember about 11:23:17  
9 the housekeeper. 11:23:20  
10 But do you recall any details, when you 11:23:22  
11 said literature or photos, what specifically she 11:23:23  
12 identified to you? 11:23:26  
13 A I don't recall. But if you get your 11:23:27  
14 subpoena prepared and you have those materials, I'm 11:23:31  
15 almost positive I asked her specific questions. 11:23:33  
16 And I do recall at one point asking if 11:23:36  
17 photographs that she had seen were in color or black 11:23:40  
18 and white, and they were clearly -- in the 11:23:43  
19 conversation I was having with her, they were 11:23:47  
20 obviously World War II like atrocity-type 11:23:49  
21 photographs or concentration camp photographs, 11:23:53  
22 things along those lines. 11:23:55  
23 And I remember asking her if they were -- 11:23:56  
24 they were on paper, of course, and I remember asking 11:24:00  
25 her if they were in color or black and white. 11:24:01



1 Q Do you recall, was the literature of the 11:24:09  
2 pamphlet variety? Was it a book? 11:24:11  
3 A I -- I don't recall, Brian. I'd like to 11:24:13  
4 say that it was in, maybe, some kind of a book, a 11:24:16  
5 bound, published book, but -- but I don't recall 11:24:19  
6 clearly. 11:24:23  
7 Q Did you get any information from her 11:24:23  
8 regarding her ability to read English while you were 11:24:26  
9 talking to her? 11:24:28  
10 A Yes. 11:24:29  
11 Q Okay. And what did she tell you about 11:24:29  
12 that? 11:24:32  
13 A That she was able to read and write and 11:24:32  
14 understand. It was just -- it was poor, you know, 11:24:34  
15 like a grade school-type level, a young grade 11:24:37  
16 school-type level. 11:24:40  
17 MR. NEACH: Okay. I don't have anything 11:24:43  
18 further. 11:24:44  
19 MR. DI BONA: Just one brief follow-up 11:24:45  
20 question. 11:24:45  
21  
22 FURTHER EXAMINATION  
23 BY MR. DI BONA:  
24 Q Did you ask the housekeeper if any of the 11:24:48  
25 information was in English or was any of it in 11:24:50

1 Spanish or German? 11:24:55

2 A I didn't ask her that. 11:24:56

3 MR. DI BONA: I don't have any further 11:24:58

4 questions. 11:24:58

5 THE VIDEOGRAPHER: This marks the end of 11:25:00

6 Media No. 2 and concludes today's testimony for 11:25:01

7 Mark Lillienfeld. 11:25:03

8 We're off the record at 11:25 a.m. 11:25:05

9 (The following proceedings were held 11:25:07

10 off the video record.) 11:25:07

11 THE REPORTER: Did you want a copy? 11:25:09

12 MR. DI BONA: Yes, please. 11:25:10

13 THE REPORTER: Did you want your copy 11:25:22

14 expedited? 11:25:23

15 MR. DI BONA: Yes, please. 11:25:24

16

17 (Whereupon, at 11:25 a.m., the deposition of

18 MARK LILLIENFELD was concluded.)

19

20 ---oOo---

21

22

23

24

25

1 STATE OF CALIFORNIA )  
2 COUNTY OF LOS ANGELES ) ss.  
3

4 I, Kimberly A. Edelen, C.S.R. No. 9042, in and  
5 for the State of California, do hereby certify:

6 That prior to being examined, the witness named  
7 in the foregoing deposition was by me duly sworn to  
8 testify the truth, the whole truth and nothing but  
9 the truth;

10 That said deposition was taken down by me in  
11 shorthand at the time and place therein named, and  
12 thereafter reduced to typewriting under my  
13 direction, and the same is a true, correct and  
14 complete transcript of said proceedings;

15 That if the foregoing pertains to the original  
16 transcript of a deposition in a Federal Case, before  
17 completion of the proceedings, review of the  
18 transcript { } was {X} was not requested.

19 I further certify that I am not interested in  
20 the event of the action.

21 Witness my hand this 17th day of April, 2025.  
22

23   
24

25 KIMBERLY A. EDELEN, C.S.R. NO. 9042

1 BRIAN NEACH, ESQ.

2 BNEACH@MILLERBARONDESS.COM

3 April 17, 2025

4 RE: Villanueva, Alex v. County Of Los Angeles, Et Al.

5 4/14/2025, Mark Lillienfeld, (#7246491).

6 The above-referenced transcript has been

7 completed by Veritext Legal Solutions and

8 review of the transcript is being handled as follows:

9 \_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext

10 to schedule a time to review the original transcript at

11 a Veritext office.

12 \_\_\_ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF

13 Transcript - The witness should review the transcript and

14 make any necessary corrections on the errata pages included

15 below, notating the page and line number of the corrections.

16 The witness should then sign and date the errata and penalty

17 of perjury pages and return the completed pages to all

18 appearing counsel within the period of time determined at

19 the deposition or provided by the Code of Civil Procedure.

20 Contact Veritext when the sealed original is required.

21 \_\_\_ Waiving the CA Code of Civil Procedure per Stipulation of

22 Counsel - Original transcript to be released for signature

23 as determined at the deposition.

24 \_\_\_ Signature Waived - Reading & Signature was waived at the

25 time of the deposition.

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1     \_\_\_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF  
2     Transcript - The witness should review the transcript and  
3     make any necessary corrections on the errata pages included  
4     below, notating the page and line number of the corrections.  
5     The witness should then sign and date the errata and penalty  
6     of perjury pages and return the completed pages to all  
7     appearing counsel within the period of time determined at  
8     the deposition or provided by the Federal Rules.

9  
10    xx Federal R&S Not Requested - Reading & Signature was not  
11    requested before the completion of the deposition.

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[&amp; - above]

<b>&amp;</b>	<b>1980</b> 14:13	36:7,8 51:24	<b>6</b>
<b>&amp;</b> 2:10 6:14 71:24 72:10	<b>1980s</b> 57:19	52:5,21	<b>6</b> 3:12
<b>0</b>	<b>1986</b> 15:9	<b>24</b> 16:24 35:17	<b>60</b> 64:17
<b>04979</b> 1:3 5:21	<b>1990s</b> 56:20	35:18,22	<b>66</b> 3:5
<b>1</b>	<b>1st</b> 37:7	<b>25</b> 16:24	<b>68</b> 3:6
	<b>2</b>	<b>2600</b> 2:4,20	<b>7</b>
<b>1</b> 1:16,25 4:4 5:15 6:20 11:5 11:6,12,23,25 12:8 39:23 49:1 50:4 72:1	<b>2</b> 4:9 6:20 39:24 50:8 52:16,18,20 69:6	5:24	<b>7</b> 3:5
<b>1's</b> 39:24	<b>20</b> 4:18 19:10 36:24 48:25	<b>27</b> 4:21 51:11	<b>72</b> 1:25
<b>100</b> 1:16	<b>2012</b> 54:4	<b>2:24</b> 1:3 5:21	<b>7246491</b> 1:24
<b>10:01</b> 2:2 5:2,6	<b>2013</b> 54:4	<b>3</b>	71:5
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**[hunterman - justification]**

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[look - mute]

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**[older - politely]**

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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VILLANUEVA v. COUNTY OF LOS ANGELES, et al. USDC CASE NO.: 2:24 cv 04979 SVW (JC)

**PROOF OF SERVICE**

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 11520 San Vicente Boulevard, Los Angeles, California 90049.


On April 28, 2025, I served the foregoing document, described as **“PLAINTIFF ALEX VILLANUEVA’S APPENDIX OF EXHIBITS IN OPPOSITION TO DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, SUMMARY ADJUDICATION, VOLUME 2 OF 5,”** on all interested parties in this action addressed as follows:

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☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 28, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Amelia Sanchez